

# EXHIBIT J

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2           IN THE UNITED STATES DISTRICT COURT  
3           FOR THE SOUTHERN DISTRICT OF NEW YORK  
4   -----X  
5   EASTERN PROFIT CORPORATION LIMITED,  
6                           Plaintiff/COUNTER-CLAIM DEFENDANT,  
7                           CASE NO.: 18-cv-2185 (JGK)  
8           -against-  
9  
10   STRATEGIC VISION US, LLC  
11                           Defendant/COUNTERCLAIM PLAINTIFF.  
12   -----X  
13                           30 (b) (6) DEPOSITION OF  
14   GOLDEN SPRING BY AND THROUGH AMELIA COLUCCIO  
15                           NEW YORK, NEW YORK  
16                           November 12, 2019  
17  
18   ATKINSON-BAKER, INC.  
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21   REPORTED BY: KIARA MILLER  
22   FILE NO.: AD0B4E5  
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<p>2 IN THE UNITED STATES DISTRICT COURT  3 FOR THE SOUTHERN DISTRICT OF NEW YORK  4 -----X  5 EASTERN PROFIT CORPORATION LIMITED,  6 Plaintiff/COUNTER-CLAIM DEFENDANT,  7 CASE NO.: 18-cv-2185(JGK)  8 -against-  9  10 STRATEGIC VISION US, LLC  11 Defendant/COUNTERCLAIM PLAINTIFF.  12 -----X  13  14 Deposition of AMELIA COLLUCIO, taken on behalf of  15 defendant/counterclaimant, at 620 Eighth Avenue,  16 27th Floor, New York, New York, commencing at 9:18  17 a.m., Tuesday, November 12, 2019, before Kiara  18 Miller.  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 2</p>	<p>2 F E D E R A L S T I P U L A T I O N  3  4 IT IS HEREBY STIPULATED AND AGREED by  5 and between the counsel for the respective  6 parties hereto, that the filing, sealing, and  7 certification of the within deposition shall be  8 and the same are hereby waived;  9 IT IS FURTHER STIPULATED AND AGREED  10 that all objections, except as to the form of  11 the question shall be reserved to the time of  12 trial.  13 IT IS FURTHER STIPULATED AND AGREED  14 that the within deposition may be signed before  15 any notary public with the same force and  16 effect as if signed and sworn to before this  17 court.  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 4</p>
<p>2 A P P E A R A N C E S :  3  4  5 GRAVES GARRETT, LLC  6 Attorneys for Plaintiff  7 1100 Main Street, Suite 2700  8 Kansas City, Missouri 64105  9  10 BY: EDWARD D. GREIM, ESQ.  11  12  13 HODGSON, RUSS  14 Attorneys for Defendant  15 605 Third Avenue, Suite 2300  16 New York, New York 10158  17  18 BY: ERIN N. TESKE, ESQ.  19  20  21 ALSO PRESENT:  22 JENNIFER DONNELLI  23 DANIEL PODHASKIE  24  25</p> <p style="text-align: right;">Page 3</p>	<p>2 VIDEOGRAPHER: Good morning, I  3 am Thomas Del Vecchio, your  4 videographer. I am present on  5 behalf of Atkinson-Baker in  6 Glendale, California. I am not  7 financially interested in this  8 action, nor am I a relative or  9 employee of any attorneys or any of  10 the parties.  11 Today's date Tuesday, November  12 12, 2019. The time is 9:18 a.m.  13 This deposition is taking place at  14 the offices of Pepper Hamilton, 620  15 8th Avenue, New York, New York. The  16 case number is 18-CV-2185, entitled  17 Eastern Profit versus Strategic  18 Vision.  19 The deponent today is  20 Ms. Amelia Coluccio. This  21 deposition is being taken on behalf  22 of the defendant/counterclaimant.  23 The court reporter today is Kiara  24 Miller from Atkinson Baker.  25 Counsel will now please</p> <p style="text-align: right;">Page 5</p>

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**30(b)(6): Amelia Coluccio**  
**November 12, 2019**

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<p>1 A. COLUCCIO  2 introduce themselves. After counsel  3 has introduced themselves, the  4 witness may be sworn in by the court  5 reporter?  6 MR. GREIM: This morning you  7 have Eddy Greim and Jennifer  8 Denalli. We are Counsel for Graves  9 Garret for Strategic Vision, which  10 is the defendant and counterclaim  11 plaintiff in this case.  12 MS. TESKE: And Erin Teske  13 with Hodgson Russ for Golden Spring  14 New York, the deponent.  15 MR. GREIM: And with us here  16 is Daniel Podhaskie, the corporate  17 rep for GSNY.  18  19 A M E L I A C O L L U C C I O, after having first  20 been duly sworn by a Notary Public of the State of  21 New York, was examined and testified as follows:  22 COURT REPORTER: Please state  23 your name for the record.  24 THE WITNESS: Amelia Coluccio.  25 COURT REPORTER: Please state</p> <p style="text-align: right;">Page 6</p>	<p>1 A. COLUCCIO  2 <b>Q And if you could, please turn to</b>  3 <b>page three, which says Exhibit A at the top</b>  4 <b>of it. You're there.</b>  5 <b>Are these the topics on which</b>  6 <b>you're prepared to testify today?</b>  7 MS. TESKE: Object to the  8 form. You can answer.  9 A Yes.  10 <b>Q And if you turn to the next page,</b>  11 <b>you'll see documents be produced pursuant to</b>  12 <b>rule 45. There's two items on that page.</b>  13 A I'm sorry, what's the question?  14 <b>Q Do you see two items on that page?</b>  15 A Yes.  16 <b>Q Did you bring any documents with</b>  17 <b>you today?</b>  18 A No.  19 <b>Q Have you seen this page four of</b>  20 <b>the subpoena before?</b>  21 A No. I don't think so.  22 <b>Q What is your position -- let me</b>  23 <b>ask you this, are you an employee of Golden</b>  24 <b>Spring?</b>  25 A Yes.</p> <p style="text-align: right;">Page 8</p>
<p>1 A. COLUCCIO  2 your address for the record.  3 THE WITNESS: 162 East 64th  4 Street, New York 10065.  5 (Whereupon, Notice of Deposition  6 was marked as Golden Spring  7 Exhibit 1 for identification as  8 of this date.)  9 BY MR. GREIM:  10 <b>Q Ms. Coluccio, good morning?</b>  11 A Good morning.  12 <b>Q I put in front of you what we've</b>  13 <b>marked as Golden Spring Exhibit One. Have</b>  14 <b>you had a chance to review that?</b>  15 A No.  16 <b>Q Please take a look at it. And my</b>  17 <b>question to you is simply, have you seen</b>  18 <b>this document before?</b>  19 A I think I have.  20 <b>Q Do you recognize this as the</b>  21 <b>notice of deposition duces tecum under which</b>  22 <b>you're here today?</b>  23 MS. TESKE: Object. You can  24 answer.  25 A Yes.</p> <p style="text-align: right;">Page 7</p>	<p>1 A. COLUCCIO  2 <b>Q What is your position?</b>  3 A Paralegal?  4 <b>Q How long have you had that role?</b>  5 A About seven months.  6 <b>Q What are your duties?</b>  7 A Mainly to help organize legal  8 files and to coordinate with outside law  9 firms.  10 <b>Q Does that include this case?</b>  11 A Yes.  12 <b>Q What other cases do you work on?</b>  13 MS. TESKE: Object. Don't  14 answer that.  15 MR. GREIM: Is that an  16 instruction not to answer?  17 MS. TESKE: Yes.  18 <b>Q How many other cases do you work</b>  19 <b>on as paralegal at Golden Spring?</b>  20 A To estimate maybe 20 to 30.  21 <b>Q Are those all cases in which</b>  22 <b>Golden Spring is a party?</b>  23 MS. TESKE: Object. Don't  24 answer that.  25 <b>Q You work full-time?</b></p> <p style="text-align: right;">Page 9</p>

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<p>1 A. COLUCCIO</p> <p>2 A Yes.</p> <p>3 <b>Q Who do you report to?</b></p> <p>4 A I report to Dan Podhaskie and</p> <p>5 Yvette Wang.</p> <p>6 <b>Q What is Dan Podhaskie's position</b></p> <p>7 <b>at Golden Spring New York?</b></p> <p>8 A Director of legal and compliance.</p> <p>9 <b>Q What is Yvette Wang's position?</b></p> <p>10 A President.</p> <p>11 <b>Q Who do you work with on a</b></p> <p>12 <b>day-to-day basis other than those two</b></p> <p>13 <b>individuals?</b></p> <p>14 A Pretty much just by myself.</p> <p>15 <b>Q The address you gave us at the</b></p> <p>16 <b>start, 162 East 64 Street, is that where you</b></p> <p>17 <b>go to work every day?</b></p> <p>18 A Correct.</p> <p>19 <b>Q Is that the Golden Spring office?</b></p> <p>20 A Correct.</p> <p>21 <b>Q How long has that been the Golden</b></p> <p>22 <b>Spring office?</b></p> <p>23 A I believe we moved to that office</p> <p>24 in May of this year.</p> <p>25 <b>Q What was the office before that?</b></p> <p style="text-align: right;">Page 10</p>	<p>1 A. COLUCCIO</p> <p>2 A Rutgers University.</p> <p>3 <b>Q When did you graduate?</b></p> <p>4 A May of 2016.</p> <p>5 <b>Q So did you take a year studying to</b></p> <p>6 <b>get your paralegal certificate?</b></p> <p>7 A No. I worked in a different field</p> <p>8 for a year.</p> <p>9 <b>Q What did you do?</b></p> <p>10 A I worked at a nonprofit and youth</p> <p>11 services.</p> <p>12 <b>Q What made you decide to be a</b></p> <p>13 <b>paralegal?</b></p> <p>14 MS. TESKE: Object, but go</p> <p>15 ahead.</p> <p>16 A I started a temporary</p> <p>17 administrative job at a law firm and they</p> <p>18 offered me the opportunity to work as a</p> <p>19 paralegal, and I was interested.</p> <p>20 <b>Q Do you have a paralegal</b></p> <p>21 <b>certificate?</b></p> <p>22 A No.</p> <p>23 <b>Q How did you come to be hired at</b></p> <p>24 <b>Golden Spring?</b></p> <p>25 A A recruiter reached out to me.</p> <p style="text-align: right;">Page 12</p>
<p>1 A. COLUCCIO</p> <p>2 A It was 800 Fifth Avenue, New York,</p> <p>3 New York.</p> <p>4 <b>Q 800 Fifth Avenue, suite 21F.</b></p> <p>5 A I think so, yeah. I was only</p> <p>6 there for a week.</p> <p>7 <b>Q All right. So I want to get a</b></p> <p>8 <b>sense of your knowledge base, so I'm going</b></p> <p>9 <b>to ask you some questions a little bit about</b></p> <p>10 <b>Golden Spring and about your preparation.</b></p> <p>11 <b>Then we're just going to march through the</b></p> <p>12 <b>topics. Okay?</b></p> <p>13 A Um-hmm.</p> <p>14 <b>Q By the way, have you given a</b></p> <p>15 <b>deposition before?</b></p> <p>16 A No.</p> <p>17 <b>Q Have you attended a deposition</b></p> <p>18 <b>before?</b></p> <p>19 A Yes.</p> <p>20 <b>Q How long have you been a</b></p> <p>21 <b>paralegal?</b></p> <p>22 A Since May of 2016 I believe -- I'm</p> <p>23 sorry, May of 2017.</p> <p>24 <b>Q Very just briefly, where'd you go</b></p> <p>25 <b>to college?</b></p> <p style="text-align: right;">Page 11</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Who was that?</b></p> <p>3 A Ryan Cohen.</p> <p>4 <b>Q So let me ask you this, how many</b></p> <p>5 <b>Golden Spring employees work 162 East 64th</b></p> <p>6 <b>Street?</b></p> <p>7 A I believe about eight.</p> <p>8 <b>Q That includes you, Mr. Podhaskie</b></p> <p>9 <b>and Ms. Wang?</b></p> <p>10 A I didn't include Ms. Wang in that</p> <p>11 because she's president, not an employee.</p> <p>12 <b>Q How many total Golden Spring</b></p> <p>13 <b>officers or employees are there?</b></p> <p>14 A Okay. Maybe nine.</p> <p>15 <b>Q Could you name for me the others</b></p> <p>16 <b>that are there? We know three of them.</b></p> <p>17 MS. TESKE: Objection. You</p> <p>18 don't need to answer that.</p> <p>19 MR. GREIM: I want to know how</p> <p>20 this person got chosen. I want to</p> <p>21 understand who the other people are.</p> <p>22 MS. TESKE: It doesn't matter.</p> <p>23 The corporation gets to decide that,</p> <p>24 not you, and that's not relevant to</p> <p>25 this case. And I'm directing her</p> <p style="text-align: right;">Page 13</p>

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<p>1 A. COLUCCIO</p> <p>2 not to answer. You can ask her</p> <p>3 again, and I'm directing her not to</p> <p>4 answer.</p> <p>5 MR. GREIM: So is the witness</p> <p>6 going to take the instruction not to</p> <p>7 disclose the other people who work</p> <p>8 with her at Golden Spring.</p> <p>9 A Yes.</p> <p>10 <b>Q Let me ask you this, did you speak</b></p> <p>11 <b>with any Golden Spring employees to prepare</b></p> <p>12 <b>yourself for today?</b></p> <p>13 A I had the privileged conversations</p> <p>14 with Dan.</p> <p>15 <b>Q Who else?</b></p> <p>16 A Employees of Golden Spring?</p> <p>17 <b>Q Yes.</b></p> <p>18 A No one.</p> <p>19 <b>Q Who else did you speak with to</b></p> <p>20 <b>prepare yourself for your testimony today?</b></p> <p>21 A Counsel for Golden Spring.</p> <p>22 <b>Q Outside counsel?</b></p> <p>23 A Golden Spring's counsel, so -- I</p> <p>24 don't understand. Sorry.</p> <p>25 <b>Q That's all right, that's okay.</b></p> <p style="text-align: right;">Page 14</p>	<p>1 A. COLUCCIO</p> <p>2 with her.</p> <p>3 <b>Q Is there anyone else you spoke</b></p> <p>4 <b>with, they don't have to be employees,</b></p> <p>5 <b>officers, is there any other person you</b></p> <p>6 <b>spoke with in preparation for your testimony</b></p> <p>7 <b>today?</b></p> <p>8 A No.</p> <p>9 <b>Q Now, you testified before that you</b></p> <p>10 <b>were the paralegal responsible for handling</b></p> <p>11 <b>this case on behalf of Golden Spring.</b></p> <p>12 A Right. I'm responsible in this</p> <p>13 case specifically. Just administrative</p> <p>14 duties, like organizing the file and</p> <p>15 scheduling meetings.</p> <p>16 <b>Q Okay. In that capacity, who are</b></p> <p>17 <b>the people that you deal with?</b></p> <p>18 A So I mean I deal with Dan at</p> <p>19 Golden Spring and then I deal with attorneys</p> <p>20 at Hodgson Russ and now attorneys at Pepper</p> <p>21 Hamilton.</p> <p>22 <b>Q Anyone else?</b></p> <p>23 A Yvette.</p> <p>24 Not that I can think of.</p> <p>25 <b>Q What about Guo Wengui or any of</b></p> <p style="text-align: right;">Page 16</p>
<p>1 A. COLUCCIO</p> <p>2 You spoke with if Mr. Podhaskie,</p> <p>3 he's in-house counsel?</p> <p>4 A Right.</p> <p>5 <b>Q My question is, did you speak with</b></p> <p>6 <b>anyone other than Mr. Podhaskie to prepare</b></p> <p>7 <b>for today?</b></p> <p>8 A Yeah. Just counsel for Golden</p> <p>9 Spring, so outside counsel.</p> <p>10 <b>Q So you mean Erin Teske and Mark</b></p> <p>11 <b>Harmon?</b></p> <p>12 A Right.</p> <p>13 <b>Q Anyone else?</b></p> <p>14 A Outside of Golden Spring?</p> <p>15 <b>Q Correct.</b></p> <p>16 A No.</p> <p>17 <b>Q Any other attorneys other than</b></p> <p>18 <b>Erin Teske, Mark Harmon and Mr. Podhaskie?</b></p> <p>19 A No.</p> <p>20 <b>Q You didn't speak with Yvette Wang</b></p> <p>21 <b>in preparation for today?</b></p> <p>22 A I did.</p> <p>23 When you asked before, you said</p> <p>24 any employees of Golden Spring, so that's</p> <p>25 why I didn't include her, but yes I spoke</p> <p style="text-align: right;">Page 15</p>	<p>1 A. COLUCCIO</p> <p>2 his representatives?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 You can answer.</p> <p>6 THE WITNESS: Okay.</p> <p>7 A I don't normally directly deal</p> <p>8 with him.</p> <p>9 <b>Q Do you know who does?</b></p> <p>10 MS. TESKE: Objection to the</p> <p>11 form.</p> <p>12 A I know.</p> <p>13 MS. TESKE: Don't guess.</p> <p>14 A I know Yvette updates him.</p> <p>15 <b>Q How do you go about scheduling for</b></p> <p>16 <b>Mr. Wengui, do you do it or do you confer</b></p> <p>17 <b>with Yvette?</b></p> <p>18 MS. TESKE: Object to the form</p> <p>19 of the question. She didn't say she</p> <p>20 scheduled for the Mr. Wengui.</p> <p>21 <b>Q Let me ask you, does any of your</b></p> <p>22 <b>scheduling or organizing of meetings relate</b></p> <p>23 <b>to Mr. Guo?</b></p> <p>24 MS. TESKE: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 17</p>

5 (Pages 14 to 17)

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<p>1 A. COLUCCIO  2 This is irrelevant. Get to  3 the point.  4 <b>Q You can answer.</b>  5 A So are you asking specifically  6 about this case?  7 <b>Q Sure. I'll start with this case.</b>  8 A I don't think I've done any  9 scheduling directly relating to him for this  10 case.  11 <b>Q Do you know who does?</b>  12 MS. TESKE: Objection to the  13 form. of the question.  14 Go ahead.  15 A I think Yvette would deal with  16 scheduling.  17 <b>Q Did you review any documents in</b>  18 <b>preparation for your testimony today?</b>  19 A No.  20 <b>Q Not even with counsel?</b>  21 A No.  22 <b>Q How about the Golden Spring New</b>  23 <b>York's corporate filings, did you review</b>  24 <b>those?</b>  25 A No.</p> <p style="text-align: right;">Page 18</p>	<p>1 A. COLUCCIO  2 A Not that I know of.  3 <b>Q Does Yvette Wang work in that</b>  4 <b>office?</b>  5 A She is there. I know she works in  6 that office, yeah.  7 <b>Q Did any other entities have</b>  8 <b>offices at 162 East 64 Street?</b>  9 MS. TESKE: Object to the form  10 of the question.  11 We are so widely off of what  12 is relevant in this case. This is a  13 complete waste of time. I will give  14 you a little more leeway, then I'm  15 going to start directing her not to  16 answer so that we can get to the  17 point of the deposition and topics  18 directed by the Court.  19 A A law firm that we work with  20 sometimes works out of that office, but I  21 don't know if that's officially their  22 business address.  23 <b>Q Any other entities?</b>  24 A Not that I know of.  25 <b>Q Who are the other officers of</b></p> <p style="text-align: right;">Page 20</p>
<p>1 A. COLUCCIO  2 <b>Q Did you have any role in keeping</b>  3 <b>those updated?</b>  4 A The filings in this case?  5 <b>Q No.</b>  6 <b>Let me ask you, are you aware</b>  7 <b>whether Golden Spring New York is registered</b>  8 <b>to do business in New York?</b>  9 A Yes.  10 <b>Q Do you know how one goes about</b>  11 <b>doing that?</b>  12 A I don't know the details.  13 <b>Q Have you had any involvement with</b>  14 <b>Golden Spring New York's filings, corporate</b>  15 <b>filings in New York?</b>  16 A No.  17 <b>Q Have you ever reviewed those</b>  18 <b>filings?</b>  19 A I don't think so.  20 <b>Q Does Golden Spring New York have</b>  21 <b>any offices other than 162 East 64 Street?</b>  22 A No.  23 <b>Q Does it have any employees who</b>  24 <b>work remotely, not in the 162 East 64 Street</b>  25 <b>office?</b></p> <p style="text-align: right;">Page 19</p>	<p>1 A. COLUCCIO  2 Golden Spring, other than Yvette Wang?  3 A Guo Qiang is a director.  4 <b>Q Who is he?</b>  5 A I know that he's a --  6 MS. TESKE: Object to the  7 form.  8 A -- director of Golden Spring.  9 <b>Q Is he's Guo Wengui's son?</b>  10 A I think so.  11 <b>Q Have you ever met Guo Qiang?</b>  12 A I think so.  13 <b>Q Where did you meet him?</b>  14 A He came to our office once.  15 <b>Q When was that?</b>  16 A I don't remember exactly. Maybe  17 last month.  18 <b>Q Did you ask to meet with him to</b>  19 <b>prepare for your deposition today?</b>  20 A No.  21 <b>Q Do you know whether Guo Qiang</b>  22 <b>gives direction to Yvette Wang as president?</b>  23 MS. TESKE: Object to the form  24 of the question.  25 You can answer, if you know.</p> <p style="text-align: right;">Page 21</p>

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<p>1 A. COLUCCIO</p> <p>2 A No.</p> <p>3 <b>Q Do you know whether Yvette Wang</b></p> <p>4 <b>gives direction to Guo Qiang?</b></p> <p>5 A No.</p> <p>6 <b>Q What are his duties as director of</b></p> <p>7 <b>Golden Spring?</b></p> <p>8 A I don't know.</p> <p>9 <b>Q What are Yvette Wang's duties as</b></p> <p>10 <b>president of Golden Spring?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Did you ask her?</b></p> <p>13 A No.</p> <p>14 <b>Q I've got to ask you, when did you</b></p> <p>15 <b>meet with Ms. Wang to prepare for your</b></p> <p>16 <b>deposition today?</b></p> <p>17 A Yesterday.</p> <p>18 <b>Q When?</b></p> <p>19 A About 4 p.m.</p> <p>20 <b>Q Was that meeting here at this</b></p> <p>21 <b>office?</b></p> <p>22 A Yes.</p> <p>23 <b>Q I didn't see you. We were taking</b></p> <p>24 <b>depositions here yesterday.</b></p> <p>25 <b>How long did you meet with her?</b></p> <p style="text-align: right;">Page 22</p>	<p>1 A. COLUCCIO</p> <p>2 A It was I believe either Wednesday</p> <p>3 or Thursday of last week.</p> <p>4 <b>Q Who told you?</b></p> <p>5 MS. TESKE: Objection to the</p> <p>6 form of the question.</p> <p>7 You can answer.</p> <p>8 A Dan.</p> <p>9 <b>Q Other than the hour-long meeting</b></p> <p>10 <b>last night, is there anything else you did</b></p> <p>11 <b>to prepare yourself since Wednesday or</b></p> <p>12 <b>Thursday for your deposition today?</b></p> <p>13 A Last night I just kind of reviewed</p> <p>14 information on my own.</p> <p>15 <b>Q After the meeting?</b></p> <p>16 A Yeah.</p> <p>17 <b>Q What did you review?</b></p> <p>18 A Just my notes from the meeting.</p> <p>19 <b>Q Did these notes consist of things</b></p> <p>20 <b>that counsel told you to say today?</b></p> <p>21 A No.</p> <p>22 MS. TESKE: Objection to the form</p> <p>23 of the question.</p> <p>24 <b>Q Did the notes consist of basic</b></p> <p>25 <b>information about Golden Spring?</b></p> <p style="text-align: right;">Page 24</p>
<p>1 A. COLUCCIO</p> <p>2 A Probably about maybe an hour.</p> <p>3 <b>Q Who else was present -- well, was</b></p> <p>4 <b>anyone else present for that meeting?</b></p> <p>5 A Yes.</p> <p>6 <b>Q Who was that?</b></p> <p>7 A Erin Teske and Mark Harmon.</p> <p>8 <b>Q How Mr. Podhaskie.</b></p> <p>9 A He came in at the end. I think we</p> <p>10 might have been pretty much done talking at</p> <p>11 that point.</p> <p>12 <b>Q All right. Did you have any other</b></p> <p>13 <b>meetings with Ms. Wang to prepare for your</b></p> <p>14 <b>testimony today?</b></p> <p>15 A No.</p> <p>16 <b>Q Did you have any other meetings</b></p> <p>17 <b>with Ms. Teske or Mr. Harmon to prepare for</b></p> <p>18 <b>your testimony today?</b></p> <p>19 A No.</p> <p>20 <b>Q Did you ever have any other</b></p> <p>21 <b>meeting with Mr. Podhaskie to prepare for</b></p> <p>22 <b>your testimony today?</b></p> <p>23 A No.</p> <p>24 <b>Q When did you learn that you would</b></p> <p>25 <b>be a 30B6 witness?</b></p> <p style="text-align: right;">Page 23</p>	<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Objection to the form</p> <p>3 of the question.</p> <p>4 You can answer.</p> <p>5 A Yes.</p> <p>6 <b>Q Do you have the notes with you</b></p> <p>7 <b>today?</b></p> <p>8 A No.</p> <p>9 <b>Q How many pages of notes? Were</b></p> <p>10 <b>they handwritten notes?</b></p> <p>11 A No.</p> <p>12 <b>Q Are they notes that you took?</b></p> <p>13 A Yes.</p> <p>14 <b>Q Did you type them up while during</b></p> <p>15 <b>the meeting?</b></p> <p>16 A Yes.</p> <p>17 <b>Q How many pages of notes did you</b></p> <p>18 <b>type up?</b></p> <p>19 A I believe.</p> <p>20 MS. TESKE: Objection to the form</p> <p>21 of the question.</p> <p>22 A I believe just one.</p> <p>23 <b>Q Are you relying on those notes for</b></p> <p>24 <b>your testimony today?</b></p> <p>25 MS. TESKE: Objection to the form</p> <p style="text-align: right;">Page 25</p>

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**30(b)(6): Amelia Coluccio**  
**November 12, 2019**



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<p>1 A. COLUCCIO</p> <p>2 of the question.</p> <p>3 A Yes.</p> <p>4 <b>Q What's the factual information</b></p> <p>5 <b>that was in the notes?</b></p> <p>6 MS. TESKE: Object.</p> <p>7 Do you have specific questions</p> <p>8 for her 'cause she's not going to</p> <p>9 the relay to you the hour-long</p> <p>10 conversation that she had with</p> <p>11 Yvette. You can ask her questions</p> <p>12 and obtain that information. She</p> <p>13 doesn't have her notes with you, she</p> <p>14 can't read it.</p> <p>15 MR. GREIM: Well, maybe she</p> <p>16 should have brought them.</p> <p>17 MS. TESKE: No.</p> <p>18 <b>Q My question is simply, right now</b></p> <p>19 <b>what is the factual information you can</b></p> <p>20 <b>remember from the notes?</b></p> <p>21 <b>And then we'll go through it and</b></p> <p>22 <b>fill in the gaps.</b></p> <p>23 MS. TESKE: I'm objecting to</p> <p>24 the form of the question. And</p> <p>25 telling you that you can ask her</p> <p style="text-align: right;">Page 26</p>	<p>1 A. COLUCCIO</p> <p>2 not to answer that question. You</p> <p>3 can ask other specific questions to</p> <p>4 get at that information.</p> <p>5 MR. GREIM: And to be very</p> <p>6 clear this is information the</p> <p>7 witness says she is relying on</p> <p>8 today, it's factual information,</p> <p>9 she's being instructed not to</p> <p>10 answer, not to disclose what it is.</p> <p>11 <b>Q By the way, when you were hired</b></p> <p>12 <b>with Golden Spring, were you told that one</b></p> <p>13 <b>of your duties would be testifying as a</b></p> <p>14 <b>corporate rep for Golden Spring?</b></p> <p>15 A No.</p> <p>16 <b>Q Have you ever testified as a</b></p> <p>17 <b>corporate rep for Golden Spring in any other</b></p> <p>18 <b>case?</b></p> <p>19 A No.</p> <p>20 <b>Q Have you read any of the</b></p> <p>21 <b>testimonies of any transcripts of the</b></p> <p>22 <b>testimony of any of the witness in this</b></p> <p>23 <b>case?</b></p> <p>24 A Yes.</p> <p>25 <b>Q Which witnesses?</b></p> <p style="text-align: right;">Page 28</p>
<p>1 A. COLUCCIO</p> <p>2 specific questions but she need not</p> <p>3 tell you every word she wrote down</p> <p>4 on that piece of paper.</p> <p>5 MR. GREIM: Your objection is</p> <p>6 noted. I'd like an answer please.</p> <p>7 MS. TESKE: You don't need to</p> <p>8 answer that question.</p> <p>9 MR. GREIM: You're instructing</p> <p>10 the witness not to tell me the</p> <p>11 factual information that she typed</p> <p>12 up last night.</p> <p>13 MS. TESKE: I'm telling you</p> <p>14 that she cannot recall the factual</p> <p>15 information.</p> <p>16 MR. GREIM: You're testifying</p> <p>17 for her. Let's see, let's see what</p> <p>18 she can recall. Unless you're going</p> <p>19 to tell her not to answer the</p> <p>20 question, in which case we'll mark</p> <p>21 it down, I'm going to ask the</p> <p>22 witness to tell me what she</p> <p>23 remembers typing up last night, the</p> <p>24 factual information.</p> <p>25 MS. TESKE: I'm telling her</p> <p style="text-align: right;">Page 27</p>	<p>1 A. COLUCCIO</p> <p>2 A Yvette.</p> <p>3 <b>Q Any others?</b></p> <p>4 A No.</p> <p>5 <b>Q Which Yvette transcripts did you</b></p> <p>6 <b>read?</b></p> <p>7 A The most recent, but I didn't</p> <p>8 fully read it.</p> <p>9 <b>Q Why not?</b></p> <p>10 A I just had to go through it.</p> <p>11 MS. TESKE: Object to the</p> <p>12 form.</p> <p>13 A I wasn't instructed to read it. I</p> <p>14 just was going through it, so I more so</p> <p>15 skimmed it. I didn't fully read it.</p> <p>16 <b>Q Why did you skim it?</b></p> <p>17 MS. TESKE: Object to the form</p> <p>18 of the question.</p> <p>19 A I don't remember.</p> <p>20 <b>Q When did you skim it?</b></p> <p>21 A Recently.</p> <p>22 <b>Q Okay. Well the deposition was</b></p> <p>23 <b>taken about --</b></p> <p>24 MS. TESKE: October 30.</p> <p>25 <b>Q About two weeks ago, it was right</b></p> <p style="text-align: right;">Page 29</p>

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<p>1 A. COLUCCIO</p> <p>2 before Halloween, okay. We got the</p> <p>3 transcript the following week, so did you</p> <p>4 skim it this week?</p> <p>5 A No. It might have been last week.</p> <p>6 <b>Q Was it after someone told you that</b></p> <p>7 <b>you had to be the 30B6 witness?</b></p> <p>8 A No.</p> <p>9 <b>Q So it was before that?</b></p> <p>10 A Yeah.</p> <p>11 <b>Q I mean is it one out of your work</b></p> <p>12 <b>duties to skim the transcript?</b></p> <p>13 MS. TESKE: Object to the form</p> <p>14 of the question.</p> <p>15 She did not review it in</p> <p>16 preparation for this deposition.</p> <p>17 Move on?</p> <p>18 MR. GREIM: Please answer the</p> <p>19 question.</p> <p>20 MS. TESKE: No, don't answer</p> <p>21 the question. It's irrelevant.</p> <p>22 MR. GREIM: No, no, wait a</p> <p>23 minute. This is one of the only</p> <p>24 things this witness might know about</p> <p>25 this case and she apparently skimmed</p> <p style="text-align: right;">Page 30</p>	<p>1 A. COLUCCIO</p> <p>2 Spring, you're not going to be relying on</p> <p>3 anything from the Yvette Wang deposition</p> <p>4 transcript; Is that correct?</p> <p>5 A Correct.</p> <p>6 <b>Q Are you familiar with the concept</b></p> <p>7 <b>of pleadings in a case?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Have you read the pleadings in</b></p> <p>10 <b>this case?</b></p> <p>11 A Again, when I first started, I</p> <p>12 might have skimmed them, but I haven't</p> <p>13 thoroughly read them.</p> <p>14 <b>Q When's last time that you read any</b></p> <p>15 <b>filings in this case?</b></p> <p>16 A I don't know.</p> <p>17 <b>Q Let's switch gears for a second</b></p> <p>18 <b>and talk about documents. Go to page four</b></p> <p>19 <b>of the subpoena and let's look at item</b></p> <p>20 <b>number one. Any and all documents relating</b></p> <p>21 <b>to Golden Springs and/or Yvette Wang's work</b></p> <p>22 <b>on behalf of Eastern Profit, Guo Wengui or</b></p> <p>23 <b>any other person or entity with respect to</b></p> <p>24 <b>the litigation between Eastern Profits or</b></p> <p>25 <b>Strategic Vision.</b></p> <p style="text-align: right;">Page 32</p>
<p>1 A. COLUCCIO</p> <p>2 the transcript. I want to know why</p> <p>3 she did it.</p> <p>4 MS. TESKE: It doesn't matter</p> <p>5 why she did it.</p> <p>6 MR. GREIM: It sure does.</p> <p>7 MS. TESKE: She did it before</p> <p>8 she was designated as a corporate</p> <p>9 representative.</p> <p>10 I'm telling you not to answer</p> <p>11 the question.</p> <p>12 <b>Q Let's try this, do you remember</b></p> <p>13 <b>anything from what you read?</b></p> <p>14 MS. TESKE: I'm directing you</p> <p>15 not to answer that question.</p> <p>16 MR. GREIM: I'd like an answer</p> <p>17 to that question.</p> <p>18 <b>Q Do you remember anything from the</b></p> <p>19 <b>transcript of Yvette Wang?</b></p> <p>20 MS. TESKE: You can answer</p> <p>21 that question. If you remember</p> <p>22 specific facts from that deposition,</p> <p>23 you can answer it.</p> <p>24 A No.</p> <p>25 <b>Q Okay. So as the 30B6 for Golden</b></p> <p style="text-align: right;">Page 31</p>	<p>1 A. COLUCCIO</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 <b>Q Who looked for those documents?</b></p> <p>5 A Which? Are you referring to</p> <p>6 actual documents that were produced?</p> <p>7 <b>Q I'm referring to documents that</b></p> <p>8 <b>are listed under number one. My question</b></p> <p>9 <b>is, well met let me ask you, did Golden</b></p> <p>10 <b>Spring conduct a search for those documents?</b></p> <p>11 A For today?</p> <p>12 <b>Q Any time.</b></p> <p>13 A I don't know. I don't.</p> <p>14 <b>Q Did they conduct a search for</b></p> <p>15 <b>today?</b></p> <p>16 A Not that I know of.</p> <p>17 <b>Q Do you know whether any documents</b></p> <p>18 <b>that are described in item one there exist?</b></p> <p>19 A I don't know.</p> <p>20 <b>Q Same thing, number two. Any and</b></p> <p>21 <b>all audio or video recordings containing</b></p> <p>22 <b>statements of Guo, Wang, Han Chunguang or</b></p> <p>23 <b>Lianchao Han regarding reflecting</b></p> <p>24 <b>representations, Golden Spring or its</b></p> <p>25 <b>agents, major Strategic Vision in the course</b></p> <p style="text-align: right;">Page 33</p>

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<p>1 A. COLUCCIO</p> <p>2 of negotiation of the contracted issue.</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 <b>Q Do you know whether any such</b></p> <p>6 <b>recordings exist?</b></p> <p>7 A As far as I know, they do not</p> <p>8 exist.</p> <p>9 <b>Q What have you done to satisfy</b></p> <p>10 <b>yourself that they don't exist?</b></p> <p>11 A I know from my conversations with</p> <p>12 Yvette that there are no recordings.</p> <p>13 <b>Q When were those conversations?</b></p> <p>14 A Just yesterday.</p> <p>15 <b>Q What did Golden Spring do to look</b></p> <p>16 <b>for the recordings?</b></p> <p>17 A I don't think they had to do</p> <p>18 anything to look for them because they knew</p> <p>19 they were nonexistent.</p> <p>20 <b>Q How did they know?</b></p> <p>21 A Because there's no equipment that</p> <p>22 is recording these conversations.</p> <p>23 <b>Q Did they check with Mr. Guo?</b></p> <p>24 MS. TESKE: Object to the form</p> <p>25 of the question, but you can answer.</p> <p style="text-align: right;">Page 34</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Now, are you familiar with an</b></p> <p>3 <b>entity called Guo Media?</b></p> <p>4 MS. TESKE: Object to the</p> <p>5 form. of the question, you don't</p> <p>6 need to answer that.</p> <p>7 <b>Q Does Guo Media have audio</b></p> <p>8 <b>recording equipment?</b></p> <p>9 MS. TESKE: Object to the</p> <p>10 scope of the question.</p> <p>11 Don't answer that.</p> <p>12 <b>Q Does Guo Media have audio</b></p> <p>13 <b>recording equipment at 162 East 64th Street?</b></p> <p>14 MS. TESKE: Object to the</p> <p>15 scope of the question.</p> <p>16 Don't answer that.</p> <p>17 If you have other questions</p> <p>18 about Guo Media the direction is</p> <p>19 going to be the same. I suggest we</p> <p>20 move on to the topics that are</p> <p>21 allowed by the court order.</p> <p>22 MR. GREIM: But wait a second.</p> <p>23 The witness just said that there's</p> <p>24 no audio or video recording</p> <p>25 equipment at 162 East 64th Street,</p> <p style="text-align: right;">Page 36</p>
<p>1 A. COLUCCIO</p> <p>2 A I don't know.</p> <p>3 <b>Q When you say there's no equipment,</b></p> <p>4 <b>what do you mean?</b></p> <p>5 A There's no audio recording</p> <p>6 equipment at our office.</p> <p>7 <b>Q Was there any audio recording</b></p> <p>8 <b>equipment at 800 Fifth Avenue?</b></p> <p>9 A No.</p> <p>10 <b>Q Do you know that personally or is</b></p> <p>11 <b>that something that Yvette told you?</b></p> <p>12 A Yvette told me. But from when I</p> <p>13 was there, I didn't see any.</p> <p>14 <b>Q Did Golden Spring check with</b></p> <p>15 <b>Mr. Guo to see if he had audio or video</b></p> <p>16 <b>recordings?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 form. You can answer.</p> <p>19 A I don't know.</p> <p>20 <b>Q Did you ask that of Yvette last</b></p> <p>21 <b>night?</b></p> <p>22 A No.</p> <p>23 <b>Q Do you know whether Yvette</b></p> <p>24 <b>checked?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 35</p>	<p>1 A. COLUCCIO</p> <p>2 but we know that Guo Media operates</p> <p>3 out of there.</p> <p>4 MS. TESKE: At the offices of</p> <p>5 GSNY is how she testified. Now if</p> <p>6 you want ask questions about how</p> <p>7 GSNY the witness is here to answer</p> <p>8 them. The witness is not here to</p> <p>9 answer questions about Guo Media,</p> <p>10 nor will she.</p> <p>11 <b>Q Does GSNY have access to Guo</b></p> <p>12 <b>Media's audio and video recording equipment?</b></p> <p>13 MS. TESKE: Object to the form</p> <p>14 of the question.</p> <p>15 You can answer, if you know.</p> <p>16 A I don't know.</p> <p>17 <b>Q Have you seen audio video</b></p> <p>18 <b>recording equipment within 162 East 64th</b></p> <p>19 <b>Street?</b></p> <p>20 MS. TESKE: Object to the form</p> <p>21 of the question.</p> <p>22 You can answer, if you know.</p> <p>23 A Within that building, yes.</p> <p>24 <b>Q Where is it?</b></p> <p>25 MS. TESKE: Object.</p> <p style="text-align: right;">Page 37</p>

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<p>1 A. COLUCCIO  2 Do not answer.  3 <b>Q Is it within the Golden Spring New</b>  4 <b>York office?</b>  5 MS. TESKE: Yeah. Object to  6 the question, you don't need to  7 answer that.  8 You're absolutely right.  9 MR. GREIM: Wait a second,  10 these are documents that had to be  11 produced today. One of the topics  12 is the documents described below  13 whether or not produced.  14 MS. TESKE: Actually what  15 needs to be produced is anything  16 within the time period that's  17 relevant. They weren't even in  18 these offices during the time period  19 that's relevant. So she's not going  20 to answer that question. If you  21 have a different question about  22 Golden Spring and its conversations  23 and communications with Eastern and  24 Mr. Guo as far as those concerned  25 the contracted at issue in this</p> <p style="text-align: right;">Page 38</p>	<p>1 A. COLUCCIO  2 64th Street?  3 A No.  4 <b>Q And you know that because Yvette</b>  5 <b>Wang told you?</b>  6 A Yes.  7 <b>Q Does Golden Spring New York have</b>  8 <b>access to recordings audio or video</b>  9 <b>recordings that are not stored physically at</b>  10 <b>its office?</b>  11 MS. TESKE: Object to the form  12 of the question.  13 I have no idea what that  14 question is asking. If you do, you  15 can attempt it.  16 MR. GREIM: I'm going to ask  17 the coaching of the witness, which  18 is blatant come to an end.  19 MS. TESKE: If you want to ask  20 questions that concern the topics in  21 the Court's order, feel free. If  22 you're going to continue to ask  23 questions about Guo Media and  24 communications that exist or  25 recordings that exist outside the</p> <p style="text-align: right;">Page 40</p>
<p>1 A. COLUCCIO  2 case, negotiating, executing,  3 performance thereof, per the Court's  4 order, please ask the witness now.  5 <b>Q Let me ask you this, does Guo</b>  6 <b>Media keep copies of recordings in its</b>  7 <b>office?</b>  8 MS. TESKE: Objection to the  9 form of the question.  10 Do not answer it.  11 She is not here to answer  12 questions about Guo Media. She is  13 here to answer questions about  14 Golden Spring New York during  15 relevant time period in so far as  16 those communications with Eastern  17 and Mr. Guo concerned the contract  18 at issue in this case. If you have  19 questions concerning that topic,  20 please ask them.  21 <b>Q Does Golden Spring New York</b>  22 <b>have -- I'm setting aside the question</b>  23 <b>whether they have recording equipment.</b>  24 <b>My question now is whether they</b>  25 <b>have recordings at their office, 162 East</b></p> <p style="text-align: right;">Page 39</p>	<p>1 A. COLUCCIO  2 relevant time period, concerning the  3 relevant topics, move on Eddy.  4 She's not answering them.  5 MR. GREIM: Please calm down  6 and stop interrupting the  7 deposition.  8 MS. TESKE: I'm perfectly  9 calm. I'm sitting in my chair and I  10 continue to keep interrupt --  11 MR. GREIM: You're  12 interrupting.  13 MS. TESKE: I will continue to  14 interrupt you.  15 MR. GREIM: No, you won't.  16 MS. TESKE: I will.  17 MR. PODHASKIE: I will end the  18 deposition. Move on.  19 MR. GREIM: Mr. Podhaskie  20 needs to be quiet too.  21 MS. TESKE: I will continue to  22 interrupt the deposition so long as  23 you are not abiding by the Court's  24 order and asking question outside  25 the scope of the Court's order, I</p> <p style="text-align: right;">Page 41</p>

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<p>1 A. COLUCCIO</p> <p>2 will continue to direct the witness</p> <p>3 not to answer.</p> <p>4 <b>Q The question is, does Golden</b></p> <p>5 <b>Spring New York have access to audio or</b></p> <p>6 <b>video recordings of statements concerning</b></p> <p>7 <b>Guo, Wang, Han Chunguang or Lianchao Han</b></p> <p>8 <b>regarding or reflecting representations</b></p> <p>9 <b>Golden Spring or its agents made to</b></p> <p>10 <b>Strategic Vision in the course of</b></p> <p>11 <b>negotiation of the contract at issue that</b></p> <p>12 <b>are not kept at the Golden Spring New York</b></p> <p>13 <b>offices?</b></p> <p>14 A No.</p> <p>15 <b>Q And how do you know that?</b></p> <p>16 A From Yvette.</p> <p>17 <b>Q When did she tell you that?</b></p> <p>18 A Yesterday.</p> <p>19 <b>Q Last night between four and 5</b></p> <p>20 <b>o'clock?</b></p> <p>21 A Yeah.</p> <p>22 <b>Q Now, Ms. Wang testified, as you're</b></p> <p>23 <b>aware on October 30, about the work that she</b></p> <p>24 <b>did on behalf of Eastern Profit.</b></p> <p>25 <b>My question for Golden Spring</b></p> <p style="text-align: right;">Page 42</p>	<p>1 A. COLUCCIO</p> <p>2 work that she did on the Eastern Profit</p> <p>3 contract not as president as Golden Spring;</p> <p>4 in other words, individually or as an</p> <p>5 officer of some other entity?</p> <p>6 A I believe --</p> <p>7 MS. TESKE: Object to the form</p> <p>8 of the question. Object to the</p> <p>9 scope of the question. The witness</p> <p>10 is here to testify as to GSNY's</p> <p>11 conversations, work, communications</p> <p>12 with Eastern and Mr. Guo as it</p> <p>13 concerns the contract. Not to any</p> <p>14 relationship or work that Ms. Wang</p> <p>15 may have had individually.</p> <p>16 MR. GREIM: What we're trying</p> <p>17 to do is find out whether there's</p> <p>18 anything in that individual</p> <p>19 category. Golden Spring ought to</p> <p>20 know whether its president was doing</p> <p>21 anything on this contract not as</p> <p>22 president of Golden Spring.</p> <p>23 <b>Q So that's my question to you, was</b></p> <p>24 <b>she?</b></p> <p>25 MS. TESKE: Object to the</p> <p style="text-align: right;">Page 44</p>
<p>1 A. COLUCCIO</p> <p>2 today is whether Ms. Wang did any work for</p> <p>3 Eastern Profit outside of her capacity as</p> <p>4 the president of Golden Spring New York?</p> <p>5 MS. TESKE: Object to the form</p> <p>6 of the question.</p> <p>7 But you can answer that.</p> <p>8 A I'm sorry. Could you repeat the</p> <p>9 question.</p> <p>10 <b>Q Sure.</b></p> <p>11 <b>Did Ms. Wang do any work for</b></p> <p>12 <b>Eastern Profit on the contracted issue in</b></p> <p>13 <b>this case outside of her capacity as the</b></p> <p>14 <b>president of Golden Spring New York?</b></p> <p>15 A I don't think so.</p> <p>16 <b>Q You seem to have some doubt, why</b></p> <p>17 <b>is that?</b></p> <p>18 A I believe she was acting as the</p> <p>19 president of Golden Spring.</p> <p>20 <b>Q How'd you come to that belief?</b></p> <p>21 A Well, I know that she is the</p> <p>22 president of Golden Spring.</p> <p>23 <b>Q Absolutely. We all know she's</b></p> <p>24 <b>president. You testified to that.</b></p> <p>25 <b>But my question is, is there any</b></p> <p style="text-align: right;">Page 43</p>	<p>1 A. COLUCCIO</p> <p>2 scope.</p> <p>3 You can answer.</p> <p>4 A I don't think so.</p> <p>5 <b>Q And where does your information</b></p> <p>6 <b>for your answer come from?</b></p> <p>7 A From my conversations with Yvette.</p> <p>8 <b>Q So did Yvette tell you that</b></p> <p>9 <b>everything that she did on the Eastern</b></p> <p>10 <b>Profit contract was as president of Golden</b></p> <p>11 <b>Spring New York.</b></p> <p>12 MS. TESKE: Object to the form</p> <p>13 of the question.</p> <p>14 You can answer.</p> <p>15 A I don't know if she said those</p> <p>16 exact words, but yes, I do know that she was</p> <p>17 acting as president of GSNY.</p> <p>18 <b>Q Is it Golden Spring's answer that</b></p> <p>19 <b>everything that Yvette Wang did on the</b></p> <p>20 <b>contract with Eastern Profit was as its</b></p> <p>21 <b>president?</b></p> <p>22 MS. TESKE: Object to the</p> <p>23 scope of the question.</p> <p>24 The witness is here to testify</p> <p>25 as to GSNY's communications and work</p> <p style="text-align: right;">Page 45</p>

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<p>1 A. COLUCCIO</p> <p>2 performed with Eastern and Mr. Guo</p> <p>3 concerning the contract. GSNY does</p> <p>4 not know, nor should it, what</p> <p>5 Ms. wang did in her individual</p> <p>6 capacity.</p> <p>7 MR. GREIM: Well, now let's</p> <p>8 not testify for Golden Spring,</p> <p>9 counsel. Let's find out what Golden</p> <p>10 Spring know.</p> <p>11 MS. TESKE: I'm telling you,</p> <p>12 Mr. Greim the scope of the order and</p> <p>13 what Golden Spring is directed to</p> <p>14 answer at this depositions. It is</p> <p>15 not directed to answer questions</p> <p>16 about how Ms. Wang acted</p> <p>17 individually in her individually</p> <p>18 capacity. You had two opportunities</p> <p>19 to depose Ms. Wang on two full days.</p> <p>20 If you had those questions for</p> <p>21 Ms. Wang, you could have asked</p> <p>22 Ms. Wang. You have a deponent for</p> <p>23 Golden Spring who is prepared to</p> <p>24 testify as to Golden Spring's</p> <p>25 communications and work with Eastern</p> <p style="text-align: right;">Page 46</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q When did Golden Spring first learn</b></p> <p>3 <b>of Eastern Profit's existence?</b></p> <p>4 MS. TESKE: Beyond the scope.</p> <p>5 You can answer, if you know.</p> <p>6 A I'm not sure.</p> <p>7 <b>Q Did you discuss that with Ms. Wang</b></p> <p>8 <b>last night?</b></p> <p>9 A Did I discuss exactly when they</p> <p>10 came to know of Eastern Profit?</p> <p>11 <b>Q Um-hmm?</b></p> <p>12 A No.</p> <p>13 <b>Q Did you discuss generally when</b></p> <p>14 <b>Golden Spring came to learn that there was</b></p> <p>15 <b>such a thing as Eastern Profit?</b></p> <p>16 A Yeah. Eastern Profit had been a</p> <p>17 client of Golden Spring.</p> <p>18 <b>Q Really. Before the contract at</b></p> <p>19 <b>issue here?</b></p> <p>20 A Yeah.</p> <p>21 <b>Q And in what capacity had Eastern</b></p> <p>22 <b>Profit been a client of Golden Spring?</b></p> <p>23 MS. TESKE: Object.</p> <p>24 Don't answer.</p> <p>25 <b>Q What was Golden Spring doing for</b></p> <p style="text-align: right;">Page 48</p>
<p>1 A. COLUCCIO</p> <p>2 and Mr. Guo concerning the contract.</p> <p>3 If you have questions like that,</p> <p>4 please feel free to ask the witness.</p> <p>5 She is not going to answer as to</p> <p>6 Ms. Wang's individual, what she did</p> <p>7 in her individual capacity.</p> <p>8 MR. GREIM: Let's take it easy</p> <p>9 on the table here as we talk to each</p> <p>10 other.</p> <p>11 MS. TESKE: Oh, let's be</p> <p>12 dramatic.</p> <p>13 <b>Q My question to the witness is, my</b></p> <p>14 <b>question to Golden Spring is, was its</b></p> <p>15 <b>president -- does it have any knowledge that</b></p> <p>16 <b>its president in dealing with Eastern Profit</b></p> <p>17 <b>was acting in any capacity outside of her</b></p> <p>18 <b>capacity as president of Golden Spring?</b></p> <p>19 MS. TESKE: Asked and</p> <p>20 answered.</p> <p>21 MR. GREIM: It's a yes or no.</p> <p>22 MS. TESKE: Asked and</p> <p>23 answered.</p> <p>24 You can answer again.</p> <p>25 A Not that I know of.</p> <p style="text-align: right;">Page 47</p>	<p>1 A. COLUCCIO</p> <p>2 Eastern Profit?</p> <p>3 MS. TESKE: Object.</p> <p>4 Don't answer.</p> <p>5 <b>Q You taking counsel's instruction</b></p> <p>6 <b>not to answer that question.</b></p> <p>7 A Yes.</p> <p>8 <b>Q Do you have any idea the general</b></p> <p>9 <b>timeframe when Golden Spring was working for</b></p> <p>10 <b>Eastern Profit before the --</b></p> <p>11 MS. TESKE: Object.</p> <p>12 <b>Q -- contract at issue here?</b></p> <p>13 MS. TESKE: Object.</p> <p>14 Don't answer.</p> <p>15 <b>Q Actually I'm going to go back on</b></p> <p>16 <b>this because if you look at topic number</b></p> <p>17 <b>two, in Exhibit A. Topic two I guess I</b></p> <p>18 <b>better read.</b></p> <p>19 <b>It says, "the ownership,</b></p> <p>20 <b>management governance and structure of</b></p> <p>21 <b>Golden Spring between 1/1/17 and 7/1/19,</b></p> <p>22 <b>including without limitation, who worked for</b></p> <p>23 <b>Golden Spring and how they were paid or the</b></p> <p>24 <b>particular witnesses are employed by Golden</b></p> <p>25 <b>Spring and, if so, their respective</b></p> <p style="text-align: right;">Page 49</p>

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<p>1 A. COLUCCIO  2 positions, whether Eastern Profit, Guo  3 Wengui, or any other person paid Golden  4 Spring for its work, what families Golden  5 Spring does work for now or in the past,  6 what kind of work Golden Spring does, Golden  7 Spring's ownership and organizational  8 structure", and decided to the Court's  9 order. Docket 189, page three, note one and  10 page ten.  11 So my question is, and I think I'm  12 entitled to know -- let's keep it to the  13 timeframe, okay.  14 So after January 1 2017 --  15 MS. TESKE: Which is when the  16 contract was executed in this case.  17 MR. GREIM: Wrong. No.  18 Please don't interrupt, okay.  19 <b>Q After January 1, 2017, what work</b>  20 <b>did Golden Spring do for Eastern Profit?</b>  21 MS. TESKE: I'm telling the  22 witness not to answer because your  23 topics are limited by the Court's  24 orders, which has specifically  25 tailored that to as it concerns the</p> <p style="text-align: right;">Page 50</p>	<p>1 A. COLUCCIO  2 MS. TESKE: On this matter.  3 A At the end of 2017.  4 <b>Q When did at the end of 2017?</b>  5 A I don't know, exactly.  6 <b>Q What did Yvette tell you?</b>  7 A About how they started to work  8 together?  9 <b>Q No, about when.</b>  10 A Oh, just end of 2017.  11 <b>Q Is it in December of 2017?</b>  12 A I didn't get a specific month.  13 <b>Q I guess you didn't get a time</b>  14 <b>within December 2017, correct?</b>  15 A Correct.  16 <b>Q How do you know that the end</b>  17 <b>of 2017 is an accurate answer to my</b>  18 <b>question?</b>  19 MS. TESKE: Asked and  20 answered.  21 You can answer again.  22 A From my conversation with Yvette.  23 <b>Q Have you looked for any written</b>  24 <b>documentation of the Golden Spring Eastern</b>  25 <b>Profit relationship related to this</b></p> <p style="text-align: right;">Page 52</p>
<p>1 A. COLUCCIO  2 contract.  3 MR. GREIM: We'll just mark  4 this and we'll come back to it. I  5 think that's incorrect.  6 MS. TESKE: I can read you the  7 Court's order right now, which  8 actually says, "defendant may ask  9 Golden Springs witness about its  10 dealings with the plaintiff, that  11 would be Eastern, during the  12 specified period, but so as to keep  13 the deposition focused on issues  14 relevant to the party's claims and  15 defenses, only in so far as those  16 dealings relate to the negotiations,  17 execution or performance of the  18 contract at issue."  19 <b>Q Let me ask you this, before Golden</b>  20 <b>Spring began to work with Eastern Profit</b>  21 <b>on -- well, let me back up.</b>  22 <b>When did Golden Spring begin to</b>  23 <b>work for Eastern Profit on --</b>  24 MS. TESKE: Object --  25 <b>Q -- on this matter?</b></p> <p style="text-align: right;">Page 51</p>	<p>1 A. COLUCCIO  2 contract?  3 A No.  4 <b>Q Do you know whether one exist?</b>  5 A No.  6 <b>Q What were the terms of Golden</b>  7 <b>Spring's work for Eastern Profit regarding</b>  8 <b>this contract?</b>  9 A Eastern Profit gave Yvette, told  10 Yvette that Eastern Profit would enter into  11 the contract.  12 <b>Q Okay. I better be a little more</b>  13 <b>clear. Well, actually let's go with that,</b>  14 <b>then we'll come back to the question I asked</b>  15 <b>you. Okay?</b>  16 A Okay.  17 <b>Q When did Eastern Profit tell</b>  18 <b>Yvette that it would enter into the research</b>  19 <b>agreement in this case?</b>  20 A At the end of 2017.  21 <b>Q When at the end of 2017?</b>  22 A That's just at the end of 2017.  23 That's all I know.  24 <b>Q Who from Eastern Profit told</b>  25 <b>Yvette that it would enter into this</b></p> <p style="text-align: right;">Page 53</p>

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<p>1 A. COLUCCIO</p> <p>2 contract?</p> <p>3 A Mr. Han.</p> <p>4 <b>Q Who is he?</b></p> <p>5 A He is the former director of</p> <p>6 Eastern Profit.</p> <p>7 <b>Q Did Golden Spring understand that</b></p> <p>8 <b>Mr. Han had authority to give direction to</b></p> <p>9 <b>Golden Spring on behalf of Eastern Profit?</b></p> <p>10 A Yes.</p> <p>11 <b>Q How?</b></p> <p>12 A Because Golden Spring knew that he</p> <p>13 was the director of Eastern Profit.</p> <p>14 <b>Q But as you just testified he was</b></p> <p>15 <b>really the former director at the time,</b></p> <p>16 <b>wasn't he?</b></p> <p>17 MS. TESKE: Objection to the</p> <p>18 form of the question.</p> <p>19 You can answer.</p> <p>20 A No. I was saying former as in</p> <p>21 he's not currently right now the director of</p> <p>22 Eastern Profit.</p> <p>23 <b>Q Oh, I see. So did Golden Spring</b></p> <p>24 <b>New York think that at the end of 2017</b></p> <p>25 <b>Mr. Han was the director of Eastern Profit?</b></p> <p style="text-align: right;">Page 54</p>	<p>1 A. COLUCCIO</p> <p>2 agreement. Let's go back a little bit to</p> <p>3 the beginning of Golden Spring's work for</p> <p>4 Eastern Profit on the research agreement.</p> <p>5 Okay?</p> <p>6 Who came to who? Did Eastern</p> <p>7 Profit come to Golden Spring asking for help</p> <p>8 or did Golden Spring go to Eastern Profit?</p> <p>9 A Golden Spring went to Eastern</p> <p>10 Profit.</p> <p>11 <b>Q And who are the natural people who</b></p> <p>12 <b>were involved there? Was it Yvette Wang</b></p> <p>13 <b>going to Mr. Han?</b></p> <p>14 A Correct.</p> <p>15 <b>Q Did Ms. Wang approach Mr. Han in</b></p> <p>16 <b>person or by phone or by email? How did</b></p> <p>17 <b>that contact occur?</b></p> <p>18 A I don't, I don't know.</p> <p>19 <b>Q So at the time that Golden Spring</b></p> <p>20 <b>approached Eastern Profit, what did Golden</b></p> <p>21 <b>Spring know about the proposed project?</b></p> <p>22 A So I think I might have said</p> <p>23 something wrong. When Golden Spring</p> <p>24 approached Mr. Han, I don't know if it was</p> <p>25 specifically asking about Eastern Profit. I</p> <p style="text-align: right;">Page 56</p>
<p>1 A. COLUCCIO</p> <p>2 A I believe so.</p> <p>3 <b>Q Do you know how it came to that</b></p> <p>4 <b>understanding?</b></p> <p>5 A I'm not sure.</p> <p>6 <b>Q You know who knows the answer to</b></p> <p>7 <b>that question?</b></p> <p>8 A No.</p> <p>9 <b>Q Would Yvette know the answer?</b></p> <p>10 A I don't know.</p> <p>11 <b>Q Did you ask her?</b></p> <p>12 A No.</p> <p>13 <b>Q Who were the various employees or</b></p> <p>14 <b>officers of Golden Spring who dealt with</b></p> <p>15 <b>Eastern Profit on the research agreement at</b></p> <p>16 <b>issue?</b></p> <p>17 A Just Yvette.</p> <p>18 <b>Q So if you were going to try to get</b></p> <p>19 <b>an answer to the question I just asked you a</b></p> <p>20 <b>moment ago, would you go to anyone else</b></p> <p>21 <b>other than Yvette an answer to that</b></p> <p>22 <b>question?</b></p> <p>23 A No.</p> <p>24 <b>Q So let's talk about, I</b></p> <p>25 <b>fast-forwarded a little bit to the research</b></p> <p style="text-align: right;">Page 55</p>	<p>1 A. COLUCCIO</p> <p>2 think Golden Spring just went to Mr. Han</p> <p>3 about this research agreement asking if</p> <p>4 Mr. Han had a company that could enter into</p> <p>5 it.</p> <p>6 <b>Q I see, I see.</b></p> <p>7 <b>So, but you testified that Golden</b></p> <p>8 <b>Spring was already working with Eastern</b></p> <p>9 <b>Profit on some other project, right?</b></p> <p>10 A Yeah.</p> <p>11 <b>Q Before this?</b></p> <p>12 A Yeah.</p> <p>13 <b>Q So did Golden Spring already know</b></p> <p>14 <b>that Mr. Han had some role with Eastern</b></p> <p>15 <b>Profit when it approached him?</b></p> <p>16 A I think so.</p> <p>17 <b>Q How do you know the answer to that</b></p> <p>18 <b>question?</b></p> <p>19 A I think that -- I'm actually not</p> <p>20 sure. I don't know. I guess I was just</p> <p>21 thinking that they would have known who the</p> <p>22 former director of Eastern Profit was.</p> <p>23 <b>Q So did Mr. Han still have any role</b></p> <p>24 <b>with Eastern Profit when Ms. Wang approached</b></p> <p>25 <b>him?</b></p> <p style="text-align: right;">Page 57</p>

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<p>1 A. COLUCCIO</p> <p>2 A Yes. I think so.</p> <p>3 <b>Q Okay. And I think you testified</b></p> <p>4 <b>earlier that Golden Spring understood</b></p> <p>5 <b>Mr. Han to be at that time still the</b></p> <p>6 <b>director of Eastern Profit, right?</b></p> <p>7 A Yeah, I think so.</p> <p>8 <b>Q Let me ask you this, why did</b></p> <p>9 <b>Golden Spring approach Mr. Han?</b></p> <p>10 A To see if he knew of any company</p> <p>11 that could enter into this research</p> <p>12 agreement.</p> <p>13 <b>Q Why did Golden Spring believe</b></p> <p>14 <b>Mr. Han would be a fruitful source of a</b></p> <p>15 <b>potential candidate companies for the</b></p> <p>16 <b>agreement?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Well, what did Golden Spring know</b></p> <p>19 <b>about Mr. Han when it approached him?</b></p> <p>20 A I'm not sure.</p> <p>21 <b>Q Who knows the answer to that</b></p> <p>22 <b>question?</b></p> <p>23 MS. TESKE: Object to the</p> <p>24 form.</p> <p>25 You can answer.</p> <p style="text-align: right;">Page 58</p>	<p>1 A. COLUCCIO</p> <p>2 of the question.</p> <p>3 A Maybe.</p> <p>4 <b>Q Well, let's keep moving ahead.</b></p> <p>5 <b>Oh, by the way, did Golden Spring</b></p> <p>6 <b>New York know whether Guo Mai (phonetic) had</b></p> <p>7 <b>any role with Eastern Profit when it</b></p> <p>8 <b>approached Mr. Han?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question.</p> <p>11 You can answer, if you know.</p> <p>12 A I don't know.</p> <p>13 <b>Q Did Guo Mai have any role with</b></p> <p>14 <b>Eastern Profit when Golden Spring approached</b></p> <p>15 <b>Mr. Han?</b></p> <p>16 MS. TESKE: Object to the form</p> <p>17 of the question. This is way beyond</p> <p>18 the scope.</p> <p>19 If you have any idea, you can</p> <p>20 answer.</p> <p>21 A I don't know.</p> <p>22 <b>Q What was discussed in that first</b></p> <p>23 <b>exchange between Ms. Wang and Mr. Han?</b></p> <p>24 A Yvette told Mr. Han about the</p> <p>25 research that Golden Spring was looking to</p> <p style="text-align: right;">Page 60</p>
<p>1 A. COLUCCIO</p> <p>2 A I guess Yvette would.</p> <p>3 <b>Q Did Golden Spring tell Mr. Han</b></p> <p>4 <b>that the negotiations were supposed to be</b></p> <p>5 <b>confidential?</b></p> <p>6 MS. TESKE: Object to the form</p> <p>7 of the question.</p> <p>8 You can answer.</p> <p>9 A I don't know.</p> <p>10 <b>Q Did Golden Spring tell Mr. Han</b></p> <p>11 <b>that Ms. Wang had promised Strategic Vision</b></p> <p>12 <b>that the only people involved with the</b></p> <p>13 <b>contract would be Lianchao Han, Yvette Wang,</b></p> <p>14 <b>Mr. Guo and Strategic Vision?</b></p> <p>15 A I don't know.</p> <p>16 <b>Q Who knows the answer to that</b></p> <p>17 <b>question?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q I guess your testimony is the only</b></p> <p>20 <b>person who dealt with Eastern Profit for</b></p> <p>21 <b>Golden Spring was Yvette?</b></p> <p>22 A Correct.</p> <p>23 <b>Q So if anyone knows it would have</b></p> <p>24 <b>to be Yvette, right?</b></p> <p>25 MS. TESKE: Object to the form</p> <p style="text-align: right;">Page 59</p>	<p>1 A. COLUCCIO</p> <p>2 do, and Mr. Han advised that Eastern Profit</p> <p>3 could enter into the contract.</p> <p>4 <b>Q Well, what was Golden Spring's</b></p> <p>5 <b>understanding about the research that it was</b></p> <p>6 <b>looking to do when it approached Mr. Han?</b></p> <p>7 A It was looking to do research on</p> <p>8 the CCP.</p> <p>9 <b>Q For what reason?</b></p> <p>10 A I'm not sure.</p> <p>11 <b>Q Well, did Golden Spring have some</b></p> <p>12 <b>reason for wanting to do research into the</b></p> <p>13 <b>CCP?</b></p> <p>14 A I'm not sure.</p> <p>15 <b>Q If Golden Spring wanted to do this</b></p> <p>16 <b>research, why did it approach anyone else?</b></p> <p>17 <b>Why didn't it just do the research itself?</b></p> <p>18 A Well, they wanted to hire an</p> <p>19 investigation company.</p> <p>20 <b>Q Right.</b></p> <p>21 A To do the research.</p> <p>22 <b>Q So why didn't Golden Spring just</b></p> <p>23 <b>hire the investigation company? Why did</b></p> <p>24 <b>they try to find someone else to hire the</b></p> <p>25 <b>investigation company?</b></p> <p style="text-align: right;">Page 61</p>

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<p>1 A. COLUCCIO</p> <p>2 A Golden Spring wasn't in a position</p> <p>3 to enter into a contract as a party.</p> <p>4 <b>Q Why not?</b></p> <p>5 A I don't know.</p> <p>6 <b>Q How do you know that they weren't</b></p> <p>7 <b>in a position to enter into a contract as a</b></p> <p>8 <b>party?</b></p> <p>9 A From my conversation with Yvette.</p> <p>10 <b>Q This is from last night?</b></p> <p>11 A Yeah.</p> <p>12 <b>Q So she didn't tell you why they</b></p> <p>13 <b>weren't in a position to enter into a</b></p> <p>14 <b>contract as a party?</b></p> <p>15 A No.</p> <p>16 <b>Q Golden Spring is licensed to do</b></p> <p>17 <b>business in New York, right?</b></p> <p>18 A Yes.</p> <p>19 <b>Q They're registered here as a</b></p> <p>20 <b>foreign corporation?</b></p> <p>21 A Golden Spring is registered in the</p> <p>22 US.</p> <p>23 <b>Q Right.</b></p> <p>24 <b>Let me back up. You know, when</b></p> <p>25 <b>you say a corporation is registered as a</b></p> <p style="text-align: right;">Page 62</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Okay, okay. Do you know of any</b></p> <p>3 <b>reason why Golden Spring could not just</b></p> <p>4 <b>enter into the contract itself?</b></p> <p>5 A No.</p> <p>6 <b>Q Well, we'll do the best we can</b></p> <p>7 <b>here. We'll keep forging ahead.</b></p> <p>8 <b>Did Mr. Han tell Golden Spring</b></p> <p>9 <b>whether it was going to be able to actually</b></p> <p>10 <b>pay for the research work under this</b></p> <p>11 <b>contract?</b></p> <p>12 MS. TESKE: Object to the</p> <p>13 form.</p> <p>14 You can answer.</p> <p>15 A Pay for the research work. I</p> <p>16 don't know.</p> <p>17 <b>Q Did Mr. Han tell Golden Spring</b></p> <p>18 <b>whether Eastern Profit could pay Golden</b></p> <p>19 <b>Spring for its work?</b></p> <p>20 A Yes.</p> <p>21 <b>Q What did he say?</b></p> <p>22 A He said that -- I'm sorry. He</p> <p>23 said Golden Spring New York would be</p> <p>24 compensated by Eastern Profit if the</p> <p>25 agreement was successful.</p> <p style="text-align: right;">Page 64</p>
<p>1 A. COLUCCIO</p> <p>2 foreign corporation, do you understand that</p> <p>3 means that they are actually formed under</p> <p>4 the law of another state and they're</p> <p>5 registered to do business in another state</p> <p>6 they're called a foreign corporation, right?</p> <p>7 Not foreign as in from outside the US, but</p> <p>8 foreign as in formed under the laws from</p> <p>9 another state, do you understand that?</p> <p>10 A Okay.</p> <p>11 <b>Q Under the laws of what other state</b></p> <p>12 <b>is Golden Spring New York formed?</b></p> <p>13 A I thought it was under New York.</p> <p>14 <b>Q Okay. Do you know the answer to</b></p> <p>15 <b>that question?</b></p> <p>16 MS. TESKE: Asked and</p> <p>17 answered.</p> <p>18 A (No verbal response given.)</p> <p>19 <b>Q Do you know the answer to that</b></p> <p>20 <b>question?</b></p> <p>21 MS. TESKE: Asked and</p> <p>22 answered.</p> <p>23 <b>Q You can answer it?</b></p> <p>24 A Well, I just told you what I</p> <p>25 thought.</p> <p style="text-align: right;">Page 63</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Did he say this right away in the</b></p> <p>3 <b>first discussion or was this in a later</b></p> <p>4 <b>discussion?</b></p> <p>5 A I'm not sure.</p> <p>6 <b>Q Did it take sometime for Eastern</b></p> <p>7 <b>Profit and Golden Spring to make their deal</b></p> <p>8 <b>about Golden Spring working for Eastern</b></p> <p>9 <b>Profit here?</b></p> <p>10 MS. TESKE: Objection to the</p> <p>11 form of the question.</p> <p>12 You can answer?</p> <p>13 A I'm not sure.</p> <p>14 <b>Q Did it take a couple of days to</b></p> <p>15 <b>negotiate the terms out?</b></p> <p>16 A I don't know how long it took.</p> <p>17 <b>Q So you don't know other than the</b></p> <p>18 <b>end of 2017 when this first approach from</b></p> <p>19 <b>Ms. Wang to Mr. Han took place and you don't</b></p> <p>20 <b>know how many days it took or if it even</b></p> <p>21 <b>took multiple days to hammer out the Eastern</b></p> <p>22 <b>Profit Golden Spring agreement, correct?</b></p> <p>23 MS. TESKE: Object to the form</p> <p>24 of the question.</p> <p>25 You can answer.</p> <p style="text-align: right;">Page 65</p>

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<p>1 A. COLUCCIO</p> <p>2 A Correct.</p> <p>3 <b>Q Who knows the answer to those</b></p> <p>4 <b>questions?</b></p> <p>5 A I would think Yvette would know.</p> <p>6 <b>Q Did you ask her last night?</b></p> <p>7 A (No verbal response.)</p> <p>8 <b>Q And you haven't looked for any</b></p> <p>9 <b>writing that reflects the terms of this</b></p> <p>10 <b>agreement?</b></p> <p>11 MS. TESKE: Object to the form</p> <p>12 of the question.</p> <p>13 You can answer.</p> <p>14 A Correct.</p> <p>15 <b>Q Why did Golden Spring agree --</b></p> <p>16 <b>well, let me go back.</b></p> <p>17 <b>You said Mr. Han told Golden</b></p> <p>18 <b>Spring it would be compensated if the</b></p> <p>19 <b>agreement was successful; what did it mean</b></p> <p>20 <b>for the agreement to be successful?</b></p> <p>21 A I'm not sure.</p> <p>22 <b>Q Does Golden Spring know?</b></p> <p>23 A I don't know.</p> <p>24 <b>Q I mean was success defined as</b></p> <p>25 <b>regime change in China? Was it defined as</b></p> <p style="text-align: right;">Page 66</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q As we're going if you remember</b></p> <p>3 <b>something you're telling me was a question</b></p> <p>4 <b>you asked her, please let me know. If you</b></p> <p>5 <b>can remember, okay?</b></p> <p>6 A Okay.</p> <p>7 <b>Q And you were typing up notes as</b></p> <p>8 <b>Ms. Wang was talking with you; was that</b></p> <p>9 <b>right?</b></p> <p>10 A Yes.</p> <p>11 MR. GREIM: I'm going to call</p> <p>12 for production of those notes.</p> <p>13 MS. TESKE: We will object.</p> <p>14 <b>Q Okay. What about there's one more</b></p> <p>15 <b>piece of this I didn't ask you about.</b></p> <p>16 <b>What was the timeline discussed?</b></p> <p>17 <b>In other words, at what point was Golden</b></p> <p>18 <b>Spring going to look back and Eastern Profit</b></p> <p>19 <b>going to look back and say, all right, we</b></p> <p>20 <b>either are successful or we're not; was that</b></p> <p>21 <b>one of the things that was part of the</b></p> <p>22 <b>agreement?</b></p> <p>23 A I don't know.</p> <p>24 MS. TESKE: Object to the form</p> <p>25 of that.</p> <p style="text-align: right;">Page 68</p>
<p>1 A. COLUCCIO</p> <p>2 some of Guo's assets get unfrozen; what was</p> <p>3 the definition?</p> <p>4 A I don't know.</p> <p>5 <b>Q Does Golden Spring know?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q Let's turn to the other half of</b></p> <p>8 <b>the agreement. How much would Golden Spring</b></p> <p>9 <b>be compensated if the agreement was</b></p> <p>10 <b>successful?</b></p> <p>11 A I don't think that was decided on.</p> <p>12 <b>Q How do you know that?</b></p> <p>13 A From my conversation with Yvette.</p> <p>14 <b>Q So did Yvette tell you the amount</b></p> <p>15 <b>of the compensation wasn't decided on?</b></p> <p>16 A Correct.</p> <p>17 <b>Q By the way in this discussion with</b></p> <p>18 <b>Yvette, did you have a chance to ask her</b></p> <p>19 <b>question or did she just kind of march</b></p> <p>20 <b>through the points with you?</b></p> <p>21 A I might have asked her, what, a</p> <p>22 couple of questions.</p> <p>23 <b>Q Do you remember any question that</b></p> <p>24 <b>you asked her?</b></p> <p>25 A Right now, I can't.</p> <p style="text-align: right;">Page 67</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Is this the typical for Golden</b></p> <p>3 <b>Spring not to have written agreements with</b></p> <p>4 <b>its clients?</b></p> <p>5 MS. TESKE: Object to the</p> <p>6 scope.</p> <p>7 If you know the answer to</p> <p>8 that, go ahead.</p> <p>9 A I don't know.</p> <p>10 <b>Q Does Golden Spring know the answer</b></p> <p>11 <b>to that question?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Does Golden Spring have written</b></p> <p>14 <b>agreements with any of its client?</b></p> <p>15 MS. TESKE: Object to the</p> <p>16 scope of that question.</p> <p>17 And you don't have to the</p> <p>18 answer that.</p> <p>19 <b>Q You're going to abide by counsel's</b></p> <p>20 <b>instruction?</b></p> <p>21 A Yes.</p> <p>22 <b>Q Were the terms of Golden Spring's</b></p> <p>23 <b>deal with Eastern Profit atypical for Golden</b></p> <p>24 <b>Spring?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 69</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Does Golden Spring have any</b></p> <p>3 <b>experience doing research work for clients?</b></p> <p>4 MS. TESKE: Object to the</p> <p>5 scope of that question.</p> <p>6 But you can answer, if you</p> <p>7 know.</p> <p>8 A Not that I know of.</p> <p>9 <b>Q So what investigation did Golden</b></p> <p>10 <b>Spring do of Eastern Profit before deciding</b></p> <p>11 <b>whether it wanted to go forward with this</b></p> <p>12 <b>deal with Eastern Profit?</b></p> <p>13 A I don't know.</p> <p>14 <b>Q Did it conduct any due diligence</b></p> <p>15 <b>of Eastern Profit?</b></p> <p>16 A I don't know.</p> <p>17 <b>Q Did it determine what Eastern</b></p> <p>18 <b>Profit's line of business was?</b></p> <p>19 A I don't know.</p> <p>20 <b>Q Did it determine who controlled</b></p> <p>21 <b>Eastern Profit?</b></p> <p>22 MS. TESKE: Objection to the</p> <p>23 form of the question.</p> <p>24 The witness has already</p> <p>25 testified that it had a preexisting</p> <p style="text-align: right;">Page 70</p>	<p>1 A. COLUCCIO</p> <p>2 controlled Eastern Profit?</p> <p>3 MS. TESKE: Object to the</p> <p>4 scope.</p> <p>5 You can answer, if you know.</p> <p>6 A I was just thinking that if two</p> <p>7 companies have a relationship, they have an</p> <p>8 idea of the officers of each company.</p> <p>9 <b>Q Do you know that?</b></p> <p>10 A No.</p> <p>11 <b>Q And do you -- you're going to be</b></p> <p>12 <b>told not to answer, but do you actually know</b></p> <p>13 <b>what that relationship is?</b></p> <p>14 MS. TESKE: Direct not to</p> <p>15 answer.</p> <p>16 <b>Q Do you yourself know what the</b></p> <p>17 <b>relationship was?</b></p> <p>18 <b>I'm not going to ask what it was.</b></p> <p>19 <b>I want to know whether this witness even</b></p> <p>20 <b>knows what the relationship was.</b></p> <p>21 MS. TESKE: I'm going to</p> <p>22 direct you not answer because she's</p> <p>23 testifying in her corporate capacity</p> <p>24 and her personal knowledge is</p> <p>25 irrelevant.</p> <p style="text-align: right;">Page 72</p>
<p>1 A. COLUCCIO</p> <p>2 relationship with Eastern Profit.</p> <p>3 But you can answer.</p> <p>4 MR. GREIM: We don't need to</p> <p>5 testify for the witness. Let's just</p> <p>6 see, let's see what Golden Spring</p> <p>7 says.</p> <p>8 <b>Q Did Golden Spring know who</b></p> <p>9 <b>controlled Eastern Profit?</b></p> <p>10 A I think so. I don't know.</p> <p>11 <b>Q Why do you say you think so?</b></p> <p>12 A Because they already had a</p> <p>13 business relationship with Eastern Profit,</p> <p>14 so I would think that they would know.</p> <p>15 <b>Q I mean was it even a major</b></p> <p>16 <b>business relationship?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 scope.</p> <p>19 You don't have to answer that.</p> <p>20 <b>Q Was it a contract of some kind?</b></p> <p>21 MS. TESKE: You don't have to</p> <p>22 answer that.</p> <p>23 <b>Q So why do you think that this</b></p> <p>24 <b>prior business relationship was sufficient</b></p> <p>25 <b>for Golden Spring to have known who</b></p> <p style="text-align: right;">Page 71</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Did Yvette Wang just tell you to</b></p> <p>3 <b>say that there was a prior relationship?</b></p> <p>4 MS. TESKE: Object to the form</p> <p>5 of the question.</p> <p>6 A She didn't tell me to say it, but</p> <p>7 she told, from my conversation with her, she</p> <p>8 said that there was a preexisting</p> <p>9 relationship.</p> <p>10 <b>Q And without disclosing what it</b></p> <p>11 <b>was, did she tell you what the relationship</b></p> <p>12 <b>was?</b></p> <p>13 A No.</p> <p>14 <b>Q Did you ask her?</b></p> <p>15 A No.</p> <p>16 <b>Q Now, both Eastern Profit and</b></p> <p>17 <b>Golden Spring New York are controlled by Guo</b></p> <p>18 <b>Wengui; Is that correct?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 Do not answer it.</p> <p>22 <b>Q They have common ownership?</b></p> <p>23 MS. TESKE: Object to the form</p> <p>24 of the question.</p> <p>25 Do not answer it.</p> <p style="text-align: right;">Page 73</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Was it an arm's length negotiation</b></p> <p>3 <b>between Yvette Wang and Han Chunguang?</b></p> <p>4 MS. TESKE: Object to the --</p> <p>5 I'm sorry.</p> <p>6 Say your question again.</p> <p>7 <b>Q Was it an arm's length negotiation</b></p> <p>8 <b>between Yvette Wang and Han Chunguang?</b></p> <p>9 MS. TESKE: What negotiation?</p> <p>10 MR. GREIM: Over the terms of</p> <p>11 Golden Spring's deal with Eastern</p> <p>12 Profit.</p> <p>13 A I don't understand the question.</p> <p>14 <b>Q Okay. Have you ever heard of the</b></p> <p>15 <b>term arm's length negotiation, have you ever</b></p> <p>16 <b>heard that before?</b></p> <p>17 A No.</p> <p>18 <b>Q Let me ask you this then -- so you</b></p> <p>19 <b>never heard that -- each side fully controls</b></p> <p>20 <b>its own position and there's no common</b></p> <p>21 <b>control of the two different sides.</b></p> <p>22 <b>So my question is, in this</b></p> <p>23 <b>negotiation about the terms under which</b></p> <p>24 <b>Golden Spring would work for Eastern Profit,</b></p> <p>25 <b>was each side fully in control of its own</b></p> <p style="text-align: right;">Page 74</p>	<p>1 A. COLUCCIO</p> <p>2 A Just all I know was that it was</p> <p>3 Golden Spring could act as limited power of</p> <p>4 attorney for Eastern Profit.</p> <p>5 <b>Q In what matters?</b></p> <p>6 A I don't, I'm not sure.</p> <p>7 <b>Q Was this in writing?</b></p> <p>8 A Yes.</p> <p>9 MR. GREIM: I call for the</p> <p>10 production of this other limited</p> <p>11 power of attorney.</p> <p>12 MS. TESKE: I don't know that</p> <p>13 there is an other limited power of</p> <p>14 attorney.</p> <p>15 MR. GREIM: Well, I've got the</p> <p>16 best they can give me.</p> <p>17 MS. TESKE: And if there is</p> <p>18 and it concerns something other than</p> <p>19 this contract, then it's not</p> <p>20 relevant to this case.</p> <p>21 MR. GREIM: Apparently it</p> <p>22 affected the negotiation between the</p> <p>23 two.</p> <p>24 MS. TESKE: I didn't hear that</p> <p>25 out of her.</p> <p style="text-align: right;">Page 76</p>
<p>1 A. COLUCCIO</p> <p>2 position in that negotiation?</p> <p>3 MS. TESKE: Object to the</p> <p>4 scope.</p> <p>5 And in so far as she is here</p> <p>6 to testify as to GSNY, not Eastern,</p> <p>7 but you can answer to the best of</p> <p>8 your ability.</p> <p>9 A From what I understand there was,</p> <p>10 there had already been a limited power of</p> <p>11 attorney in place for Golden Spring to act</p> <p>12 as Eastern Profit's limited power of</p> <p>13 attorney.</p> <p>14 So Mr. Han basically told Yvette</p> <p>15 that she could go forward on behalf of</p> <p>16 Eastern Profit because there was that</p> <p>17 limited power of attorney.</p> <p>18 <b>Q So even before Golden Spring</b></p> <p>19 <b>approached Eastern Profit about the research</b></p> <p>20 <b>agreement, Golden Spring already held a</b></p> <p>21 <b>limited power of attorney on behalf of</b></p> <p>22 <b>Eastern Profit?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Okay. What was the scope of that</b></p> <p>25 <b>authority?</b></p> <p style="text-align: right;">Page 75</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Have you ever seen it?</b></p> <p>3 A No.</p> <p>4 <b>Q Who told you it existed?</b></p> <p>5 A Yvette.</p> <p>6 <b>Q When?</b></p> <p>7 A Yesterday.</p> <p>8 <b>Q Did you ask to see it?</b></p> <p>9 A No.</p> <p>10 <b>Q Well, since GSNY already had this</b></p> <p>11 <b>limited power of attorney, why did they even</b></p> <p>12 <b>go to Mr. an Chin Gwan and ask for</b></p> <p>13 <b>permission for Eastern Profit to enter into</b></p> <p>14 <b>the research agreement?</b></p> <p>15 MS. TESKE: Object to the form</p> <p>16 of the question.</p> <p>17 A I don't know.</p> <p>18 <b>Q So did the limited power of</b></p> <p>19 <b>attorney not already give Golden Spring</b></p> <p>20 <b>authority to just put Eastern Profit's name</b></p> <p>21 <b>on the agreement?</b></p> <p>22 MS. TESKE: Object to the form</p> <p>23 of the question.</p> <p>24 A I don't know.</p> <p>25 <b>Q Who knows the answer?</b></p> <p style="text-align: right;">Page 77</p>

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<p>1 A. COLUCCIO</p> <p>2 A I don't know for sure.</p> <p>3 <b>Q Did Golden Spring come up with a</b></p> <p>4 <b>budget for how much it would cost to work on</b></p> <p>5 <b>this project for Eastern Profit?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q Has Golden Spring been paid for</b></p> <p>8 <b>its work on behalf of Eastern Profit?</b></p> <p>9 A No.</p> <p>10 <b>Q Does Golden Spring New York have</b></p> <p>11 <b>any clients who pay it for work on projects?</b></p> <p>12 MS. TESKE: Object.</p> <p>13 Don't answer that.</p> <p>14 <b>Q Is it typical -- well, let me ask</b></p> <p>15 <b>you this.</b></p> <p>16 <b>How many hours has Golden Spring</b></p> <p>17 <b>put into this Eastern Profit negotiation,</b></p> <p>18 <b>performance, everything that's covered under</b></p> <p>19 <b>its work for Eastern Profit, how many hours</b></p> <p>20 <b>has Golden Spring put into it?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q Hundred hours?</b></p> <p>23 A I don't know.</p> <p>24 <b>Q A thousand?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 78</p>	<p>1 A. COLUCCIO</p> <p>2 A Right.</p> <p>3 <b>Q And I suppose you spent sometime</b></p> <p>4 <b>on it too?</b></p> <p>5 A On this litigation matter?</p> <p>6 <b>Q Yes.</b></p> <p>7 A In an administrative sense, yes.</p> <p>8 <b>Q What about the Han Chunguang, does</b></p> <p>9 <b>he spend time on this?</b></p> <p>10 A I --</p> <p>11 MS. TESKE: Object to the form</p> <p>12 of the question.</p> <p>13 You can answer.</p> <p>14 A I don't know.</p> <p>15 <b>Q Is he a Golden Spring employee?</b></p> <p>16 A No.</p> <p>17 <b>Q Does he work in a Golden Spring</b></p> <p>18 <b>office?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 A No.</p> <p>22 <b>Q You seem uncertain about that?</b></p> <p>23 A I've seen him at the office, but I</p> <p>24 don't think he works out of the office.</p> <p>25 <b>Q Where does he work?</b></p> <p style="text-align: right;">Page 80</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q Who are the different staff at</b></p> <p>3 <b>Golden Spring who work on the Eastern Profit</b></p> <p>4 <b>project?</b></p> <p>5 MS. TESKE: Object to the</p> <p>6 form. Asked and answered.</p> <p>7 You can answer.</p> <p>8 A Just Yvette.</p> <p>9 <b>Q Mr. Podhaskie too though, right?</b></p> <p>10 A I'm sorry. The Eastern Profit</p> <p>11 project?</p> <p>12 <b>Q Yeah. Let's go back.</b></p> <p>13 <b>Is that unclear to you?</b></p> <p>14 A Yes.</p> <p>15 <b>Q Let's go from the negotiation of</b></p> <p>16 <b>the contract through the performance through</b></p> <p>17 <b>everything else that is under the limited</b></p> <p>18 <b>power of attorney.</b></p> <p>19 <b>And so my question is who works on</b></p> <p>20 <b>those things? So far we got Yvette and my</b></p> <p>21 <b>next question is, is that Mr. Podhaskie as</b></p> <p>22 <b>well?</b></p> <p>23 A Not that I know of.</p> <p>24 <b>Q Other than his time spent in this</b></p> <p>25 <b>litigation itself?</b></p> <p style="text-align: right;">Page 79</p>	<p>1 A. COLUCCIO</p> <p>2 A I don't --</p> <p>3 MS. TESKE: Object.</p> <p>4 You don't have to answer that.</p> <p>5 <b>Q I'm sorry, what were you about to</b></p> <p>6 <b>say?</b></p> <p>7 MS. TESKE: I'm directing her</p> <p>8 not to answer. It's way beyond the</p> <p>9 scope.</p> <p>10 <b>Q Does he have a Golden Spring email</b></p> <p>11 <b>address?</b></p> <p>12 A Not that I know of.</p> <p>13 VIDEOGRAPHER: Counselor.</p> <p>14 <b>Q Why did Eastern Profit tell Golden</b></p> <p>15 <b>Spring it would enter into the contract?</b></p> <p>16 A Because, well I know that Mr. Han</p> <p>17 was being persecuted by the CCP and was</p> <p>18 interested in doing research on them, and</p> <p>19 Eastern was in a position to enter into the</p> <p>20 contract.</p> <p>21 <b>Q What do you mean it was in a</b></p> <p>22 <b>position to be able to enter into the</b></p> <p>23 <b>contract?</b></p> <p>24 A It was able to.</p> <p>25 <b>Q That's literally what Mr. Han told</b></p> <p style="text-align: right;">Page 81</p>

21 (Pages 78 to 81)



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<p>1 A. COLUCCIO</p> <p>2 Ms. Wang?</p> <p>3 MS. TESKE: Object to the form</p> <p>4 of the question.</p> <p>5 You can answer.</p> <p>6 A From what I understand.</p> <p>7 <b>Q Well, does Golden Spring actually</b></p> <p>8 <b>know that what Mr. Han said is true, that</b></p> <p>9 <b>he's being persecuted by the CCP?</b></p> <p>10 MS. TESKE: Object to the form</p> <p>11 of the question.</p> <p>12 You can answer.</p> <p>13 A I don't know.</p> <p>14 <b>Q Did Golden Spring make any efforts</b></p> <p>15 <b>to see whether Mr. Han's story was correct?</b></p> <p>16 A I don't know.</p> <p>17 <b>Q Who would know the answer to that</b></p> <p>18 <b>question?</b></p> <p>19 A I think maybe Yvette would.</p> <p>20 <b>Q Did Mr. Han tell Golden Spring</b></p> <p>21 <b>what the persecution consisted of?</b></p> <p>22 A I don't know.</p> <p>23 <b>Q Did Mr. Han tell Golden Spring why</b></p> <p>24 <b>he thought entering into this research</b></p> <p>25 <b>agreement would ease the persecution?</b></p> <p style="text-align: right;">Page 82</p>	<p>1 A. COLUCCIO</p> <p>2 agreement was successful.</p> <p>3 <b>Q Okay. My question is a little bit</b></p> <p>4 <b>different though.</b></p> <p>5 <b>My question is, did Eastern Profit</b></p> <p>6 <b>tell Golden Spring how Eastern Profit</b></p> <p>7 <b>intended to pay for the research itself?</b></p> <p>8 A I don't know.</p> <p>9 <b>Q Well, did a time come when Golden</b></p> <p>10 <b>Spring learned that Eastern Profit couldn't</b></p> <p>11 <b>pay anyone anything?</b></p> <p>12 MS. TESKE: Object to the form</p> <p>13 of the question.</p> <p>14 A I don't know.</p> <p>15 <b>Q Who knows the answer to that</b></p> <p>16 <b>question?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Is it unusual for Golden Spring to</b></p> <p>19 <b>work for free?</b></p> <p>20 MS. TESKE: Object to the form</p> <p>21 of the question.</p> <p>22 You can answer.</p> <p>23 A I don't know.</p> <p>24 <b>Q Did Golden Spring already know</b></p> <p>25 <b>that Eastern Profit's assets were frozen at</b></p> <p style="text-align: right;">Page 84</p>
<p>1 A. COLUCCIO</p> <p>2 A I don't --</p> <p>3 MS. TESKE: Object to the form</p> <p>4 of the question.</p> <p>5 You can answer.</p> <p>6 A I don't know.</p> <p>7 <b>Q Did Mr. Han tell Golden Spring</b></p> <p>8 <b>what its goals were, what Eastern Profit's</b></p> <p>9 <b>goals were in entering into the research</b></p> <p>10 <b>agreement?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Did Mr. Han give Golden Spring New</b></p> <p>13 <b>York any parameters in terms of how much it</b></p> <p>14 <b>was willing to spend on the research</b></p> <p>15 <b>agreement?</b></p> <p>16 A I don't know.</p> <p>17 <b>Q Mr. Han tell Golden Spring whether</b></p> <p>18 <b>Eastern Profit itself could even afford to</b></p> <p>19 <b>pay for research?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 You can answer.</p> <p>23 A I'm not sure. I just know that</p> <p>24 they, that he said that Golden Spring would</p> <p>25 be compensated by Eastern Profit if the</p> <p style="text-align: right;">Page 83</p>	<p>1 A. COLUCCIO</p> <p>2 the time it entered, it began its</p> <p>3 discussions with Eastern Profit?</p> <p>4 MS. TESKE: Object to the form</p> <p>5 of the question.</p> <p>6 You can answer.</p> <p>7 A I don't know.</p> <p>8 <b>Q Did Golden Spring come up with any</b></p> <p>9 <b>backup plan to be paid if it did all this</b></p> <p>10 <b>work for Eastern Profit and the contract --</b></p> <p>11 <b>and it was owed money?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Who did Ms. Wang report to with</b></p> <p>14 <b>respect to her work on the project?</b></p> <p>15 A She didn't report to anyone.</p> <p>16 <b>Q How do you know that?</b></p> <p>17 A From my conversations with her.</p> <p>18 <b>Q Did she refer to Guo Wengui as her</b></p> <p>19 <b>boss?</b></p> <p>20 A No.</p> <p>21 <b>Q How do you know?</b></p> <p>22 A She told me.</p> <p>23 <b>Q So she specifically told you last</b></p> <p>24 <b>night that she never referred to Guo Wengui</b></p> <p>25 <b>as her boss?</b></p> <p style="text-align: right;">Page 85</p>

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<p>1 A. COLUCCIO</p> <p>2 A No. She didn't specifically say</p> <p>3 that, but she did say that she didn't report</p> <p>4 to anyone.</p> <p>5 <b>Q So you don't know the answer to</b></p> <p>6 <b>whether she told other people that Guo</b></p> <p>7 <b>Wengui was her boss in negotiating this</b></p> <p>8 <b>contract?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question, object to the</p> <p>11 scope.</p> <p>12 We're not here to testify</p> <p>13 about Ms. Wang in her personal</p> <p>14 capacity. We're here to testify</p> <p>15 about GSNY's communications with</p> <p>16 Eastern and Guo concerning the</p> <p>17 contract.</p> <p>18 MR. GREIM: Wait a minute,</p> <p>19 wait a second here.</p> <p>20 So did Ms. Wang have</p> <p>21 discussions with Strategic Vision in</p> <p>22 her personal capacity not as a</p> <p>23 president of Golden Spring?</p> <p>24 MS. TESKE: Your question is</p> <p>25 open ended, and I'm saying that you</p> <p style="text-align: right;">Page 86</p>	<p>1 A. COLUCCIO</p> <p>2 negotiations really got underway. And I'm</p> <p>3 going to go back a little bit earlier in</p> <p>4 time before we move on and power through</p> <p>5 here.</p> <p>6 So my question to you is, how</p> <p>7 did Golden Spring first learn about</p> <p>8 the research agreement?</p> <p>9 A Mr. Guo introduced, Mr. Guo had</p> <p>10 met with Wallop and Waller and had discussed</p> <p>11 doing research with them, and then he</p> <p>12 introduced them to Yvette.</p> <p>13 <b>Q So did he introduce Yvette as</b></p> <p>14 <b>president of Golden Spring?</b></p> <p>15 A Yeah.</p> <p>16 <b>Q He did, okay.</b></p> <p>17 <b>Did this occur at a meeting?</b></p> <p>18 A I'm not sure.</p> <p>19 <b>Q Well, when Mr. Guo introduced --</b></p> <p>20 <b>by the way, do you know the first name of</b></p> <p>21 <b>Wallop?</b></p> <p>22 A French.</p> <p>23 <b>Q And the first name of Waller?</b></p> <p>24 A Jay Michael.</p> <p>25 <b>Q Did this introduction by Mr. Guo</b></p> <p style="text-align: right;">Page 88</p>
<p>1 A. COLUCCIO</p> <p>2 need to ask questions specific to</p> <p>3 communications with Eastern and Guo</p> <p>4 concerning this contract.</p> <p>5 MR. GREIM: Okay. Let's take</p> <p>6 a break.</p> <p>7 VIDEOGRAPHER: The time is</p> <p>8 10:45 a.m. Tuesday, November</p> <p>9 12, 2019.</p> <p>10 This is the end of media</p> <p>11 number one of the videotaped</p> <p>12 deposition of Amelia Coluccio.</p> <p>13 We're off the record.</p> <p>14 (Whereupon, a recess was taken</p> <p>15 from 10:45 a.m. to 10:59 a.m.)</p> <p>16 VIDEOGRAPHER: The time is</p> <p>17 10:59 a.m., Tuesday November</p> <p>18 12, 2019.</p> <p>19 This is media number two of</p> <p>20 the videotaped deposition of Ms.</p> <p>21 Amelia Coluccio.</p> <p>22 We are back on the record.</p> <p>23 <b>Q Now, we were just talking before</b></p> <p>24 <b>the break about the Golden Spring Eastern</b></p> <p>25 <b>Profit's interactions before the</b></p> <p style="text-align: right;">Page 87</p>	<p>1 A. COLUCCIO</p> <p>2 of Strategic Vision to Yvette Wang happen in</p> <p>3 person?</p> <p>4 A I don't know.</p> <p>5 <b>Q Do you know when it happened?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q But it happened, I take it, before</b></p> <p>8 <b>Ms. Wang approached Eastern Profit?</b></p> <p>9 A Correct.</p> <p>10 <b>Q What did Mr. Guo say about Golden</b></p> <p>11 <b>Spring to Wallop and Waller?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Does Golden Spring know?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Who knows the answer to that</b></p> <p>16 <b>question?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Yvette Wang?</b></p> <p>19 A I don't know.</p> <p>20 <b>Q Well, you testified that -- well,</b></p> <p>21 <b>actually was Yvette Wang present for the</b></p> <p>22 <b>introduction?</b></p> <p>23 MS. TESKE: Object to the</p> <p>24 form.</p> <p>25 You can answer.</p> <p style="text-align: right;">Page 89</p>

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**30(b)(6): Amelia Coluccio**  
**November 12, 2019**



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<p>1 A. COLUCCIO</p> <p>2 A I would think she would have to</p> <p>3 be.</p> <p>4 <b>Q Right. So wouldn't you think</b></p> <p>5 <b>she'd probably know what Mr. Guo said?</b></p> <p>6 MS. TESKE: Objection to the</p> <p>7 form.</p> <p>8 You can answer.</p> <p>9 A I guess so.</p> <p>10 <b>Q Well, was she translating to</b></p> <p>11 <b>Mr. Guo to Wallop and Waller?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Does Golden Spring know the answer</b></p> <p>14 <b>to that question?</b></p> <p>15 A I don't know.</p> <p>16 <b>Q So is Mr. Guo speaking in English</b></p> <p>17 <b>at the instruction of Golden Spring to</b></p> <p>18 <b>Wallop and Waller?</b></p> <p>19 A I don't know.</p> <p>20 <b>Q Who knows the answer to that?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q Mr. Guo, does Mr. Guo know the</b></p> <p>23 <b>answer to it?</b></p> <p>24 A I would think so.</p> <p>25 <b>Q Does Ms. Wang know the answer to</b></p> <p style="text-align: right;">Page 90</p>	<p>1 A. COLUCCIO</p> <p>2 Vision and Golden Spring and Mr. Guo?</p> <p>3 A No. I don't think so.</p> <p>4 <b>Q What all was discussed at this</b></p> <p>5 <b>first meeting between Golden Spring, Mr. Guo</b></p> <p>6 <b>and Strategic Vision?</b></p> <p>7 MS. TESKE: These questions</p> <p>8 have already been answered, but you</p> <p>9 can answer them, if you know.</p> <p>10 A Just, I thought they wanted to do</p> <p>11 research on the CCP.</p> <p>12 <b>Q Were any names identified in that</b></p> <p>13 <b>first meeting?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Were the reasons for the research</b></p> <p>16 <b>discussed in that first meeting?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Was the expected timeline</b></p> <p>19 <b>discussed in the first meeting?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q Was the relationship between</b></p> <p>22 <b>Golden Spring and Mr. Guo discussed in that</b></p> <p>23 <b>first meeting?</b></p> <p>24 A I don't know.</p> <p>25 <b>Q And Eastern Profit could not have</b></p> <p style="text-align: right;">Page 92</p>
<p>1 A. COLUCCIO</p> <p>2 it?</p> <p>3 A I would think so.</p> <p>4 <b>Q What did Golden Spring say about</b></p> <p>5 <b>itself to Wallop and Waller at this</b></p> <p>6 <b>introduction?</b></p> <p>7 A That Golden Spring was interested</p> <p>8 in doing research on the CCP.</p> <p>9 <b>Q Did Golden Spring say why it was</b></p> <p>10 <b>interested in doing research on the CCP?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Why was Golden Spring interested</b></p> <p>13 <b>in doing research on the CCP?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q What research did Golden Spring</b></p> <p>16 <b>want to do into the CCP?</b></p> <p>17 A I know that they wanted to</p> <p>18 investigate a list of names.</p> <p>19 <b>Q How do you know that?</b></p> <p>20 A Um, because I know that that was</p> <p>21 one of the things that Yvette as president</p> <p>22 of Golden Spring had discussed with Mr. Guo.</p> <p>23 <b>Q So did Yvette as president of</b></p> <p>24 <b>Golden Spring discuss this with Mr. Guo</b></p> <p>25 <b>before the first meeting between Strategic</b></p> <p style="text-align: right;">Page 91</p>	<p>1 A. COLUCCIO</p> <p>2 been mentioned yet in that first meeting</p> <p>3 because Golden Spring hadn't yet gone to</p> <p>4 Eastern Profit, correct?</p> <p>5 A Right they hadn't yet gone to</p> <p>6 Eastern Profit.</p> <p>7 <b>Q So was it discussed at the first</b></p> <p>8 <b>meeting that Golden Spring would actually be</b></p> <p>9 <b>the entity entering into the research</b></p> <p>10 <b>agreement with Strategic Vision?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Was it discussed at Mr. Guo</b></p> <p>13 <b>himself would be entering into the research</b></p> <p>14 <b>agreement with Strategic Vision?</b></p> <p>15 A Not that I know of.</p> <p>16 <b>Q So you don't know either way?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 form.</p> <p>19 A Right, I don't know.</p> <p>20 <b>Q What about have you ever heard of</b></p> <p>21 <b>someone named Lianchao Han?</b></p> <p>22 A I've heard the name.</p> <p>23 <b>Q Okay. Where have you heard the</b></p> <p>24 <b>name before?</b></p> <p>25 A Just from organizing these</p> <p style="text-align: right;">Page 93</p>

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<p>1 A. COLUCCIO</p> <p>2 documents I've just come across the name.</p> <p>3 <b>Q What's his relationship to Golden</b></p> <p>4 <b>Spring?</b></p> <p>5 A I don't know.</p> <p>6 MS. TESKE: Object to the</p> <p>7 form.</p> <p>8 <b>Q Do you understand whether Lianchao</b></p> <p>9 <b>Han was discussed as the person to sign the</b></p> <p>10 <b>research agreement with Strategic Vision?</b></p> <p>11 A No.</p> <p>12 <b>Q Does Golden Spring know the answer</b></p> <p>13 <b>to that question?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Was Golden Spring's existence</b></p> <p>16 <b>actually disclosed to Strategic Vision in</b></p> <p>17 <b>this introductory meeting?</b></p> <p>18 A I believe so.</p> <p>19 <b>Q Why do you say you believe so?</b></p> <p>20 A Because I believe Yvette was</p> <p>21 introduced as the president of Golden</p> <p>22 Spring.</p> <p>23 <b>Q Okay. How do you know that?</b></p> <p>24 A From my the conversation with</p> <p>25 Yvette.</p> <p style="text-align: right;">Page 94</p>	<p>1 A. COLUCCIO</p> <p>2 march down that too fast.</p> <p>3 Had Golden Spring done research into</p> <p>4 the -- well, let me ask you this, how many names</p> <p>5 were there that Golden Spring gave to Strategic</p> <p>6 Vision?</p> <p>7 A I don't know.</p> <p>8 <b>Q Was it ten?</b></p> <p>9 A I don't know.</p> <p>10 <b>Q Twenty?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Am I close at all? Do you have</b></p> <p>13 <b>some general sense of how many names there</b></p> <p>14 <b>were?</b></p> <p>15 A No.</p> <p>16 <b>Q Did Golden Spring do research in</b></p> <p>17 <b>with another company into those same names?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q Can you name me anyone one of the</b></p> <p>20 <b>names?</b></p> <p>21 A No.</p> <p>22 <b>Q How did Golden Spring come up with</b></p> <p>23 <b>the names?</b></p> <p>24 MS. TESKE: Object to the</p> <p>25 form.</p> <p style="text-align: right;">Page 96</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q Would that be in your notes?</b></p> <p>3 MS. TESKE: Object to the form</p> <p>4 of the question.</p> <p>5 A I don't know if that specific line</p> <p>6 is in my notes. I didn't write down</p> <p>7 everything that was said.</p> <p>8 <b>Q By the way, so far have we covered</b></p> <p>9 <b>at least somethings that are in your notes?</b></p> <p>10 A Yes.</p> <p>11 <b>Q Is there anything specific that</b></p> <p>12 <b>Golden Spring asked you to make sure you say</b></p> <p>13 <b>today?</b></p> <p>14 MS. TESKE: Object to the form</p> <p>15 of the question.</p> <p>16 You can answer.</p> <p>17 A No.</p> <p>18 <b>Q Is there anything Golden Spring</b></p> <p>19 <b>asked you to make sure you don't say today?</b></p> <p>20 MS. TESKE: Object to the form</p> <p>21 of the question.</p> <p>22 You can answer.</p> <p>23 A No.</p> <p>24 <b>Q When was the next meeting</b></p> <p>25 <b>between -- let me back up. I don't want to</b></p> <p style="text-align: right;">Page 95</p>	<p>1 A. COLUCCIO</p> <p>2 You can answer.</p> <p>3 A I know that Mr. Guo gave some</p> <p>4 advice on coming up with the list of names.</p> <p>5 <b>Q What do you mean by advice?</b></p> <p>6 A Maybe gave suggestions who to add</p> <p>7 to the list. Not sure. I just know he gave</p> <p>8 advice.</p> <p>9 <b>Q Why do you use the word advice?</b></p> <p>10 A Because that's my understanding of</p> <p>11 what happened.</p> <p>12 <b>Q And that comes from what Yvette</b></p> <p>13 <b>Wang told you last night?</b></p> <p>14 A Yeah.</p> <p>15 <b>Q Is that the word Yvette Wang used</b></p> <p>16 <b>when she told you that Mr. Guo gave advice?</b></p> <p>17 A I don't remember specifically if</p> <p>18 that's the exact word she used.</p> <p>19 <b>Q Did she give you any further</b></p> <p>20 <b>description of what Mr. Guo did other than</b></p> <p>21 <b>to tell you that he gave advice?</b></p> <p>22 MS. TESKE: Object to the</p> <p>23 form.</p> <p>24 A You mean regarding this list of</p> <p>25 names?</p> <p style="text-align: right;">Page 97</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Yes.</b></p> <p>3 A From what I understand, he just</p> <p>4 gave advice on helping to come up with the</p> <p>5 list of names.</p> <p>6 <b>Q Then my question is, do you have</b></p> <p>7 <b>any other understanding other than that</b></p> <p>8 <b>word, advice, about what Mr. Guo did?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question.</p> <p>11 A No.</p> <p>12 <b>Q Do you have authority from Golden</b></p> <p>13 <b>Spring to say anything contrary to what</b></p> <p>14 <b>Yvette Wang told you last night?</b></p> <p>15 MS. TESKE: Object to the form</p> <p>16 of the question.</p> <p>17 A Yes.</p> <p>18 <b>Q So far have you told me anything</b></p> <p>19 <b>contrary to what Ms. Wang told you last</b></p> <p>20 <b>night?</b></p> <p>21 MS. TESKE: Object the form of</p> <p>22 the question.</p> <p>23 You can answer?</p> <p>24 A I am not sure.</p> <p>25 <b>Q Where did Golden Spring obtain</b></p> <p style="text-align: right;">Page 98</p>	<p>1 A. COLUCCIO</p> <p>2 form.</p> <p>3 <b>Q Did Guo want -- Well, let me ask</b></p> <p>4 <b>you this, so did Guo not give all the names</b></p> <p>5 <b>to Ms. Wang?</b></p> <p>6 A From what I understand, that's</p> <p>7 correct. He did not give all the names to</p> <p>8 her.</p> <p>9 <b>Q Which names did Mr. Guo give to</b></p> <p>10 <b>Ms. Wang?</b></p> <p>11 A I don't --</p> <p>12 MS. TESKE: These questions</p> <p>13 have been answered, but you can</p> <p>14 answer, if you know.</p> <p>15 A I don't know.</p> <p>16 <b>Q What did Mr. Guo tell Ms. Wang</b></p> <p>17 <b>about the names he was giving?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q Who proposed the final set of</b></p> <p>20 <b>names? Was it, were they from Mr. Guo or</b></p> <p>21 <b>from Yvette Wang herself?</b></p> <p>22 MS. TESKE: Asked and</p> <p>23 answered, but you can answer.</p> <p>24 A Yvette.</p> <p>25 <b>Q When I said the final set, you</b></p> <p style="text-align: right;">Page 100</p>
<p>1 A. COLUCCIO</p> <p>2 the -- well, let me ask you this.</p> <p>3 What exactly did Golden Spring</p> <p>4 give to Strategic Vision, what did the work</p> <p>5 product look like?</p> <p>6 MS. TESKE: Object.</p> <p>7 These questions have been</p> <p>8 answered, but you can answer, if you</p> <p>9 know.</p> <p>10 A I don't know other than a list of</p> <p>11 names.</p> <p>12 <b>Q Was it a list or did it have</b></p> <p>13 <b>attached information for the different</b></p> <p>14 <b>names?</b></p> <p>15 A I don't know.</p> <p>16 <b>Q Do you know other than Mr. Guo who</b></p> <p>17 <b>else worked on compiling the list?</b></p> <p>18 A Yvette.</p> <p>19 <b>Q Other than Yvette and Mr. Guo, who</b></p> <p>20 <b>else worked on compiling the list?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q Where did Yvette go to come up</b></p> <p>23 <b>with the names?</b></p> <p>24 A I don't know.</p> <p>25 MS. TESKE: Object to the</p> <p style="text-align: right;">Page 99</p>	<p>1 A. COLUCCIO</p> <p>2 understand that there were five names added</p> <p>3 to the list at the end?</p> <p>4 MS. TESKE: Object to the</p> <p>5 form.</p> <p>6 <b>Q Have you heard that before?</b></p> <p>7 A No.</p> <p>8 <b>Q Yvette Wang didn't tell you that</b></p> <p>9 <b>last night?</b></p> <p>10 A Correct.</p> <p>11 <b>Q Can Golden Spring New York tell me</b></p> <p>12 <b>who came up with the last five names on the</b></p> <p>13 <b>list?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Did Mr. Guo tell Golden Spring</b></p> <p>16 <b>what his views were on the last five names</b></p> <p>17 <b>added to the list?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q What did Guo and Golden Spring</b></p> <p>20 <b>tell Strategic Vision about what they intend</b></p> <p>21 <b>to do with with the research results?</b></p> <p>22 A I don't know.</p> <p>23 <b>Q Did you discuss this with Ms. wang</b></p> <p>24 <b>last night?</b></p> <p>25 A No.</p> <p style="text-align: right;">Page 101</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Didn't they tell Strategic Vision</b></p> <p>3 <b>that intended to publicize the research</b></p> <p>4 <b>results at the appropriate time?</b></p> <p>5 MS. TESKE: Objection to the</p> <p>6 form.</p> <p>7 These questions have been</p> <p>8 answered, but you can answer, if you</p> <p>9 know.</p> <p>10 A I don't know.</p> <p>11 <b>Q Did they disclose to Strategic</b></p> <p>12 <b>Vision how they intended to publicize the</b></p> <p>13 <b>results?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q Did they tell Strategic Vision</b></p> <p>16 <b>that they intended to use Mr. Guo's own</b></p> <p>17 <b>media entity to publicize the research</b></p> <p>18 <b>results?</b></p> <p>19 MS. TESKE: Object to the</p> <p>20 form.</p> <p>21 If you could, answer.</p> <p>22 A I don't know.</p> <p>23 <b>Q Why don't you, if you could take a</b></p> <p>24 <b>look at topic three on the list.</b></p> <p>25 <b>Do you see that?</b></p> <p style="text-align: right;">Page 102</p>	<p>1 A. COLUCCIO</p> <p>2 topic three?</p> <p>3 MS. TESKE: Objection to the</p> <p>4 form of the question.</p> <p>5 You can answer, if anything is</p> <p>6 popping out to you.</p> <p>7 A Not anything I can think of they</p> <p>8 haven't already said.</p> <p>9 <b>Q Did Golden Spring explore any</b></p> <p>10 <b>other candidates for entering into this</b></p> <p>11 <b>research agreement other than Eastern</b></p> <p>12 <b>Profit?</b></p> <p>13 A I don't know.</p> <p>14 <b>Q What did Golden Spring tell</b></p> <p>15 <b>Strategic Vision about how the research</b></p> <p>16 <b>results would be disseminated?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q In other words, did -- let me ask</b></p> <p>19 <b>you this. Did Golden Spring have any deal</b></p> <p>20 <b>with Guo Wengui or Eastern Profit about who</b></p> <p>21 <b>would be able to see the research results?</b></p> <p>22 MS. TESKE: Object to the form</p> <p>23 of the question.</p> <p>24 You can answer.</p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 104</p>
<p>1 A. COLUCCIO</p> <p>2 A Um-hmm.</p> <p>3 <b>Q Golden Spring dealings with</b></p> <p>4 <b>Eastern Profit and the Guo Wengui between</b></p> <p>5 <b>January 1, 2017, and July 1, 2019, as those</b></p> <p>6 <b>dealings relate to the negotiation,</b></p> <p>7 <b>execution or performance of the contract at</b></p> <p>8 <b>issue.</b></p> <p>9 <b>Do you see that?</b></p> <p>10 A Um-hmm.</p> <p>11 <b>Q Why don't you just tell me what</b></p> <p>12 <b>you know about topic three. What did Yvette</b></p> <p>13 <b>Wang tell you last night that relates to</b></p> <p>14 <b>topic three?</b></p> <p>15 MS. TESKE: Object to the</p> <p>16 form, but you can answer.</p> <p>17 A So I know that Mr. Guo, as I said,</p> <p>18 gave advice regarding the list of names.</p> <p>19 And he also gave advice regarding the terms</p> <p>20 of the research agreement and then dealings</p> <p>21 with Eastern Profit. Like I said, she had a</p> <p>22 discussion with Mr. Han, and Mr. Han said</p> <p>23 Eastern Profit could enter into the</p> <p>24 contract.</p> <p>25 <b>Q Do you know anything else about</b></p> <p style="text-align: right;">Page 103</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Did Golden Spring have any deal</b></p> <p>3 <b>with Eastern Profit or Guo Wengui that a</b></p> <p>4 <b>company called ACA would be able to have the</b></p> <p>5 <b>research results?</b></p> <p>6 MS. TESKE: Object to the form</p> <p>7 of the question.</p> <p>8 You can answer.</p> <p>9 A I don't know.</p> <p>10 <b>Q Did Golden Spring Eastern Profit</b></p> <p>11 <b>and Mr. Wengui have any deal regarding who</b></p> <p>12 <b>would decide how the research results would</b></p> <p>13 <b>be used or disseminated?</b></p> <p>14 MS. TESKE: Object to the form</p> <p>15 of the question.</p> <p>16 You can answer.</p> <p>17 A I don't know.</p> <p>18 <b>Q Who knows the answer to that</b></p> <p>19 <b>question?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q What did Mr. Guo advise Golden</b></p> <p>22 <b>Spring regarding the terms of the research</b></p> <p>23 <b>agreement?</b></p> <p>24 A I believe he gave advice on the</p> <p>25 financial terms in the agreement.</p> <p style="text-align: right;">Page 105</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q What was his advice?</b></p> <p>3 A I don't know.</p> <p>4 <b>Q What were the financial terms of</b></p> <p>5 <b>the agreement?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q So Guo knew of the finances of</b></p> <p>8 <b>Eastern Profit?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question.</p> <p>11 How is she supposed to opine</p> <p>12 on that? That's not what she's here</p> <p>13 to testify on. She's here to</p> <p>14 testify to Golden Spring's</p> <p>15 knowledge, not Mr. Guo's knowledge.</p> <p>16 <b>Q When Mr. Guo was advising Eastern</b></p> <p>17 <b>Profit on the financial terms of the</b></p> <p>18 <b>research agreement, didn't he know what</b></p> <p>19 <b>Eastern Profit's own finances were?</b></p> <p>20 MS. TESKE: Same objection.</p> <p>21 <b>Q Did he disclose them?</b></p> <p>22 MS. TESKE: Do you have a</p> <p>23 question about GSNY?</p> <p>24 <b>Q Oh, I did say Eastern Profit. I</b></p> <p>25 <b>keep forgetting we have to keep them</b></p> <p style="text-align: right;">Page 106</p>	<p>1 A. COLUCCIO</p> <p>2 A I don't know.</p> <p>3 <b>Q Did you ask any of these questions</b></p> <p>4 <b>of Yvette Wang last night?</b></p> <p>5 A No.</p> <p>6 <b>Q Did she volunteer any of this to</b></p> <p>7 <b>you?</b></p> <p>8 A No.</p> <p>9 <b>Q Did Golden Spring give advice to</b></p> <p>10 <b>Eastern Profit on the terms of the research</b></p> <p>11 <b>agreement?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Well, let me ask you this, you</b></p> <p>14 <b>already testified that there was this</b></p> <p>15 <b>meeting between Golden Spring and between</b></p> <p>16 <b>Yvette Wang, right, acting on behalf of</b></p> <p>17 <b>Golden Spring, correct?</b></p> <p>18 A Correct.</p> <p>19 <b>Q And Mr. Han Chunguang, right?</b></p> <p>20 A Correct.</p> <p>21 <b>Q In that meeting she disclosed the</b></p> <p>22 <b>research agreement, right?</b></p> <p>23 A Correct.</p> <p>24 <b>Q Let's do this right. Strike that.</b></p> <p>25 <b>In that meeting she disclosed that</b></p> <p style="text-align: right;">Page 108</p>
<p>1 A. COLUCCIO</p> <p>2 distinct.</p> <p>3 So when Mr. Guo gave advice to</p> <p>4 Golden Spring on the terms of the research</p> <p>5 agreement, did he disclose that he knew the</p> <p>6 financial condition of Eastern Profit?</p> <p>7 A I don't know.</p> <p>8 <b>Q Well, Mr. Guo advised that he was</b></p> <p>9 <b>fine with the million dollar deposit, didn't</b></p> <p>10 <b>he?</b></p> <p>11 MS. TESKE: Object to the form</p> <p>12 of the question.</p> <p>13 You can answer that, if you</p> <p>14 know.</p> <p>15 A I don't know.</p> <p>16 <b>Q Was Mr. Guo fine with the research</b></p> <p>17 <b>agreement having a million dollar deposit</b></p> <p>18 <b>when Eastern Profit had no way to pay it?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't know.</p> <p>22 <b>Q What did he tell Golden Spring</b></p> <p>23 <b>about that?</b></p> <p>24 MS. TESKE: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 107</p>	<p>1 A. COLUCCIO</p> <p>2 there was this research project, right?</p> <p>3 A Right.</p> <p>4 <b>Q And your testimony is that Mr. Han</b></p> <p>5 <b>Chunguang immediately agreed; is that right?</b></p> <p>6 MS. TESKE: Object to the</p> <p>7 form.</p> <p>8 You can answer.</p> <p>9 A I don't think I said immediately</p> <p>10 agreed.</p> <p>11 <b>Q So Golden Spring isn't sure</b></p> <p>12 <b>whether Han Chunguang told he agreed after</b></p> <p>13 <b>that first disclosure?</b></p> <p>14 A No. From what I understand he did</p> <p>15 agree in that first meeting.</p> <p>16 <b>Q Oh, okay.</b></p> <p>17 <b>And when was the next time that</b></p> <p>18 <b>Golden Spring reported to Eastern Profit</b></p> <p>19 <b>regarding anything about the research</b></p> <p>20 <b>agreement?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q Well, did Golden Spring ask</b></p> <p>23 <b>Eastern Profit for authority to actually</b></p> <p>24 <b>sign the research agreement?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 109</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Well, I'm asking you whether</b></p> <p>3 <b>Golden Spring knows. Does Golden Spring</b></p> <p>4 <b>know whether it asked Mr. Han Chunguang</b></p> <p>5 <b>after that first discussion for authority to</b></p> <p>6 <b>sign the research agreement?</b></p> <p>7 MS. TESKE: Object to the</p> <p>8 form.</p> <p>9 You can answer.</p> <p>10 A I don't know.</p> <p>11 <b>Q Well, how about this, do you</b></p> <p>12 <b>handle reports from Golden Spring to Eastern</b></p> <p>13 <b>Profit about the contract?</b></p> <p>14 A No.</p> <p>15 <b>Q How about the litigation?</b></p> <p>16 A No.</p> <p>17 <b>Q You ever seen any?</b></p> <p>18 A Any reports?</p> <p>19 <b>Q Um-hmm. From Golden Spring to</b></p> <p>20 <b>Eastern Profit about the contract.</b></p> <p>21 A No.</p> <p>22 <b>Q Have you ever seen any email from</b></p> <p>23 <b>Golden Spring to Eastern Profit about the</b></p> <p>24 <b>research agreement at issue here?</b></p> <p>25 A No.</p> <p style="text-align: right;">Page 110</p>	<p>1 A. COLUCCIO</p> <p>2 A I don't know.</p> <p>3 <b>Q I'm going to hand you what we're</b></p> <p>4 <b>marking as Golden Spring two. Take a look</b></p> <p>5 <b>at this if you could please.</b></p> <p>6 <b>Whereupon, Limited Power of</b></p> <p>7 <b>Attorney was marked as</b></p> <p>8 <b>Plaintiff's Exhibit 2 for</b></p> <p>9 <b>identification as of this date.)</b></p> <p>10 <b>Q Take a look at this if you could</b></p> <p>11 <b>please. You see it's a two page document.</b></p> <p>12 <b>Top says limited power of attorney. Bates</b></p> <p>13 <b>number, Eastern 276 to 277.</b></p> <p>14 <b>Have you seen this before?</b></p> <p>15 A No.</p> <p>16 <b>Q You don't recognize this document?</b></p> <p>17 A I haven't seen it.</p> <p>18 <b>Q Did Golden Spring negotiate this</b></p> <p>19 <b>with Eastern Profit?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q You see the person who notarized</b></p> <p>22 <b>it on the bottom of page two?</b></p> <p>23 A Yes.</p> <p>24 <b>Q What name do you see there?</b></p> <p>25 A Karin Maistrello.</p> <p style="text-align: right;">Page 112</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q What about any email from Golden</b></p> <p>3 <b>Spring to Eastern Profit reporting on the</b></p> <p>4 <b>litigation?</b></p> <p>5 A No.</p> <p>6 <b>Q Does Yvette Wang have the</b></p> <p>7 <b>authority to sign Han Chunguang's name on</b></p> <p>8 <b>documents for Eastern Profit?</b></p> <p>9 MS. TESKE: Object to the form</p> <p>10 of the question.</p> <p>11 A I don't know.</p> <p>12 <b>Q Is that within the scope of the</b></p> <p>13 <b>limited power of attorney that Eastern</b></p> <p>14 <b>Profit has granted to Golden Spring in this</b></p> <p>15 <b>case?</b></p> <p>16 MS. TESKE: Object to the form</p> <p>17 of the question.</p> <p>18 A I don't know.</p> <p>19 <b>Q At what point does Mr. Chunguang</b></p> <p>20 <b>have to approve decisions that Golden Spring</b></p> <p>21 <b>makes regarding the contract?</b></p> <p>22 A I don't know.</p> <p>23 <b>Q At what point does Han Chunguang</b></p> <p>24 <b>have to approve decisions that Golden Spring</b></p> <p>25 <b>makes regarding litigation?</b></p> <p style="text-align: right;">Page 111</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Is she a Golden Spring employee?</b></p> <p>3 A Yes.</p> <p>4 <b>Q You see who signed it up above</b></p> <p>5 <b>Chunguang Han?</b></p> <p>6 A Yes.</p> <p>7 <b>Q We already established he's not a</b></p> <p>8 <b>Golden Spring employee, but you know who he</b></p> <p>9 <b>is?</b></p> <p>10 A Yes.</p> <p>11 <b>Q Do you know who filled in as title</b></p> <p>12 <b>as director?</b></p> <p>13 A No.</p> <p>14 <b>Q Have you talked to Karin</b></p> <p>15 <b>Maistrello about the case?</b></p> <p>16 A No.</p> <p>17 <b>Q So I guess just to be clear, this</b></p> <p>18 <b>limited power of attorney was not shown to</b></p> <p>19 <b>you in your meeting last night?</b></p> <p>20 A Correct.</p> <p>21 <b>Q Do you have any understanding</b></p> <p>22 <b>about what the limited power of attorney</b></p> <p>23 <b>covers?</b></p> <p>24 A No.</p> <p>25 <b>Q Do you know whether the limited</b></p> <p style="text-align: right;">Page 113</p>

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<p>1 A. COLUCCIO</p> <p>2 power of attorney that you testified about</p> <p>3 earlier is broader or narrower in scope than</p> <p>4 this limited power of attorney?</p> <p>5 Why don't you take a second and</p> <p>6 look at the operative portions. You'll see</p> <p>7 it starts in the middle. "This appointment</p> <p>8 shall apply only to the following enumerated</p> <p>9 transactions and nothing herein or in the</p> <p>10 agreement shall be construed to the</p> <p>11 contrary."</p> <p>12 And first of all, you'll see it</p> <p>13 says, an appointment, then it mentions an</p> <p>14 agreement. Are you aware of any other</p> <p>15 agreement?</p> <p>16 A No.</p> <p>17 <b>Q Well, do you know whether a lawyer</b></p> <p>18 <b>even drafted this?</b></p> <p>19 A I don't know who drafted this.</p> <p>20 <b>Q Well, let's look at the power of</b></p> <p>21 <b>attorney here. Number one, negotiating a</b></p> <p>22 <b>contract between Eastern and SV.</b></p> <p>23 <b>Do you see that there?</b></p> <p>24 A Um-hmm.</p> <p>25 <b>Q Second, executing a contract</b></p> <p style="text-align: right;">Page 114</p>	<p>1 A. COLUCCIO</p> <p>2 A Yes.</p> <p>3 <b>Q Now, that was before the</b></p> <p>4 <b>negotiation or the agreement began; is that</b></p> <p>5 <b>right?</b></p> <p>6 A From what I understand, yes.</p> <p>7 <b>Q And if you see this was signed, it</b></p> <p>8 <b>purports to be signed the 30th day of</b></p> <p>9 <b>August, 2018, right?</b></p> <p>10 A Right.</p> <p>11 <b>Q Do you know why this was not</b></p> <p>12 <b>signed until August 30th of 2018?</b></p> <p>13 A I don't know why.</p> <p>14 <b>Q And by the way, has Golden Spring</b></p> <p>15 <b>been given a power of attorney like this for</b></p> <p>16 <b>any other client of its?</b></p> <p>17 MS. TESKE: Objection.</p> <p>18 You don't have to answer that</p> <p>19 question.</p> <p>20 <b>Q Have you ever seen a power of</b></p> <p>21 <b>attorney like this before?</b></p> <p>22 A Have I ever seen one?</p> <p>23 <b>Q Um-hmm.</b></p> <p>24 A Yes.</p> <p>25 <b>Q In similar format to this?</b></p> <p style="text-align: right;">Page 116</p>
<p>1 A. COLUCCIO</p> <p>2 between Eastern and SV, right?</p> <p>3 A Um-hmm.</p> <p>4 <b>Q And then third the full and</b></p> <p>5 <b>present preservation of Eastern's rights</b></p> <p>6 <b>under any contract between Eastern and SV,</b></p> <p>7 <b>including but not limited to, prosecuting</b></p> <p>8 <b>and/or defending any and all claims</b></p> <p>9 <b>concerning the relationship between Eastern</b></p> <p>10 <b>and SV; including, but not limited to, any</b></p> <p>11 <b>and all of the following acts. And it's got</b></p> <p>12 <b>three things there.</b></p> <p>13 <b>Do you see that?</b></p> <p>14 A Yes.</p> <p>15 <b>Q A is retaining counsel; B is</b></p> <p>16 <b>executing affidavits and pleadings on behalf</b></p> <p>17 <b>of Eastern; and C is resolving and/or</b></p> <p>18 <b>resettling any dispute between Eastern and</b></p> <p>19 <b>SV via execution of the settlement</b></p> <p>20 <b>agreement.</b></p> <p>21 <b>Do you see all those things?</b></p> <p>22 A Yes.</p> <p>23 <b>Q Go to the next paragraph it goes</b></p> <p>24 <b>on and do you see where it says this is</b></p> <p>25 <b>effective as of October 1, 2017, right?</b></p> <p style="text-align: right;">Page 115</p>	<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Object to the</p> <p>3 form.</p> <p>4 You can answer.</p> <p>5 A I haven't thoroughly read through</p> <p>6 others that I've seen.</p> <p>7 <b>Q Well, we just went through the</b></p> <p>8 <b>terms and my question to you is, is this</b></p> <p>9 <b>broader or narrower than the power of</b></p> <p>10 <b>attorney you testified about earlier that</b></p> <p>11 <b>Golden Spring already had on behalf of</b></p> <p>12 <b>Eastern before Yvette Wang went to talk to</b></p> <p>13 <b>Han Chunguang?</b></p> <p>14 MS. TESKE: Object to the</p> <p>15 form, but you can answer.</p> <p>16 A This is the one that I was</p> <p>17 referring to.</p> <p>18 <b>Q I see.</b></p> <p>19 A From what I understand since it</p> <p>20 was in effect starting in October of 2017.</p> <p>21 <b>Q Right. But in October no one knew</b></p> <p>22 <b>that this power of attorney was going to be</b></p> <p>23 <b>executed, did they?</b></p> <p>24 A I don't know.</p> <p>25 <b>Q So do you think there was a prior</b></p> <p style="text-align: right;">Page 117</p>

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<p>1 A. COLUCCIO</p> <p>2 version of this from October?</p> <p>3 A Not that I know of.</p> <p>4 <b>Q So do you know whether Eastern --</b></p> <p>5 <b>do you know whether a power of attorney</b></p> <p>6 <b>actually existed in October 2017 between</b></p> <p>7 <b>Strategic Vision and Eastern Profit?</b></p> <p>8 A Other than this?</p> <p>9 <b>Q Other than this.</b></p> <p>10 A Not that I know of.</p> <p>11 <b>Q So did Golden Spring back in</b></p> <p>12 <b>October of 2017 know that it already had a</b></p> <p>13 <b>power of attorney for Eastern Profit?</b></p> <p>14 MS. TESKE: Object to the</p> <p>15 form.</p> <p>16 You can answer.</p> <p>17 A From what I understood, yes.</p> <p>18 <b>Q So how did they know? How did</b></p> <p>19 <b>Golden Spring know it had a power of</b></p> <p>20 <b>attorney back in October --</b></p> <p>21 A I don't know.</p> <p>22 <b>Q -- of 2017?</b></p> <p>23 A I don't know.</p> <p>24 <b>Q Well, who told you that Golden</b></p> <p>25 <b>Spring understood this?</b></p> <p style="text-align: right;">Page 118</p>	<p>1 A. COLUCCIO</p> <p>2 remember it was executed in August, right?</p> <p>3 A Um-hmm.</p> <p>4 <b>Q My question to you is about what</b></p> <p>5 <b>Golden Spring understood back in October or</b></p> <p>6 <b>back in the period before the first</b></p> <p>7 <b>approach.</b></p> <p>8 A Yeah.</p> <p>9 <b>Q Did Golden Spring understand that</b></p> <p>10 <b>it was operating under a power of attorney</b></p> <p>11 <b>that's as broad as this one or was it one</b></p> <p>12 <b>that was narrower than this?</b></p> <p>13 MS. TESKE: Object to the</p> <p>14 form.</p> <p>15 You can answer.</p> <p>16 A I don't know.</p> <p>17 <b>Q Who was running the day-to-day</b></p> <p>18 <b>operations of Eastern Profit during the time</b></p> <p>19 <b>before the approach between Yvette Wang and</b></p> <p>20 <b>Han Chunguang?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 scope of the question.</p> <p>23 If you know, you can answer?</p> <p>24 A I don't know.</p> <p>25 <b>Q Did Golden Spring when it</b></p> <p style="text-align: right;">Page 120</p>
<p>1 A. COLUCCIO</p> <p>2 A Yvette.</p> <p>3 <b>Q So Yvette told you last night that</b></p> <p>4 <b>in October of 2017, Golden Spring already</b></p> <p>5 <b>believed it had a power of attorney for</b></p> <p>6 <b>Eastern Profit?</b></p> <p>7 A I don't think she gave me a</p> <p>8 specific month. She just said it existed</p> <p>9 before she had the initial conversation with</p> <p>10 Mr. Han.</p> <p>11 <b>Q Okay. So during that period</b></p> <p>12 <b>before she had the initial conversation with</b></p> <p>13 <b>Mr. Han, was the power of attorney that</b></p> <p>14 <b>Eastern Profit, I'm sorry, that Golden</b></p> <p>15 <b>Spring was operating under at that time</b></p> <p>16 <b>broader or narrower than this later written</b></p> <p>17 <b>power of attorney?</b></p> <p>18 MS. TESKE: Object to the</p> <p>19 form. Asked and answered.</p> <p>20 <b>Q You can answer. She just</b></p> <p>21 <b>objected.</b></p> <p>22 A So from what I understand this is</p> <p>23 the power of attorney that I had been</p> <p>24 referring to.</p> <p>25 <b>Q I understand. I understand, but</b></p> <p style="text-align: right;">Page 119</p>	<p>1 A. COLUCCIO</p> <p>2 approached Han Chunguang know what Eastern</p> <p>3 Profit did?</p> <p>4 A I don't know.</p> <p>5 <b>Q Did Golden Spring know Eastern</b></p> <p>6 <b>Profit's line of business?</b></p> <p>7 A I don't know.</p> <p>8 <b>Q Did Golden Spring know whether</b></p> <p>9 <b>Eastern Profit was credit worthy?</b></p> <p>10 A I don't know.</p> <p>11 <b>Q Let talk about Guo Wengui.</b></p> <p>12 <b>Have you seen him before by the</b></p> <p>13 <b>way?</b></p> <p>14 A Yes.</p> <p>15 <b>Q You'd recognize him if you saw him</b></p> <p>16 <b>in person?</b></p> <p>17 A Yes.</p> <p>18 <b>Q Now we talked about Golden</b></p> <p>19 <b>Spring's agency, for lack of a better term,</b></p> <p>20 <b>for Eastern Profit.</b></p> <p>21 <b>My question now is, what did</b></p> <p>22 <b>Golden Spring understand Guo Wengui's</b></p> <p>23 <b>relationship to be with Eastern Profit.</b></p> <p>24 MS. TESKE: Object to the</p> <p>25 form.</p> <p style="text-align: right;">Page 121</p>

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<p>1 A. COLUCCIO</p> <p>2 You can answer?</p> <p>3 A I don't know.</p> <p>4 <b>Q What did Golden Spring understand</b></p> <p>5 <b>Guo's relationship to be with Golden Spring?</b></p> <p>6 A That he's a client of Golden</p> <p>7 Spring.</p> <p>8 <b>Q Is he also part owner of Golden</b></p> <p>9 <b>Spring?</b></p> <p>10 A No. Not that I know of.</p> <p>11 <b>Q Who owns Golden Spring?</b></p> <p>12 A I don't know. I know Yvette's the</p> <p>13 president, and I don't know who the owner</p> <p>14 is.</p> <p>15 <b>Q Well, who's the sole director of</b></p> <p>16 <b>Golden Spring?</b></p> <p>17 A I know Guo Qiang is a director.</p> <p>18 <b>Q And who owns all the shares of</b></p> <p>19 <b>Golden Spring New York?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q Golden Spring Hong Kong, isn't it?</b></p> <p>22 MS. TESKE: Object to the</p> <p>23 form.</p> <p>24 You can answer.</p> <p>25 THE WITNESS: Okay.</p> <p style="text-align: right;">Page 122</p>	<p>1 A. COLUCCIO</p> <p>2 that our clients need help with.</p> <p>3 <b>Q Why do you call them professional?</b></p> <p>4 A I don't know.</p> <p>5 <b>Q Well, is that what Yvette Wang</b></p> <p>6 <b>told you to say last night, professional</b></p> <p>7 <b>services?</b></p> <p>8 MS. TESKE: Object to the form</p> <p>9 of the question.</p> <p>10 I think it's an offensive and</p> <p>11 inappropriate question.</p> <p>12 A I don't know if she used those</p> <p>13 specific words.</p> <p>14 <b>Q What did she tell you to say that</b></p> <p>15 <b>Golden Spring does?</b></p> <p>16 MS. TESKE: Object to the form</p> <p>17 of the question. I find it to be</p> <p>18 offensive and an inappropriate</p> <p>19 question.</p> <p>20 You can answer.</p> <p>21 A She didn't specifically tell me to</p> <p>22 say anything, but our conversation was from</p> <p>23 what I understood is that we offer services</p> <p>24 to clients within the US.</p> <p>25 <b>Q What kind of services?</b></p> <p style="text-align: right;">Page 124</p>
<p>1 A. COLUCCIO</p> <p>2 A Yeah, I'm sorry. China Golden</p> <p>3 Spring owns Golden Spring New York.</p> <p>4 <b>Q By the way, do you get paid by</b></p> <p>5 <b>Golden Spring New York?</b></p> <p>6 A Yes.</p> <p>7 <b>Q Does anybody else pay you for your</b></p> <p>8 <b>work?</b></p> <p>9 MS. TESKE: Object to the</p> <p>10 form.</p> <p>11 A No.</p> <p>12 <b>Q Who owns Golden Spring Hong Kong?</b></p> <p>13 A I don't know.</p> <p>14 <b>Q Do you know what line of work it's</b></p> <p>15 <b>in?</b></p> <p>16 A No.</p> <p>17 <b>Q Do you know what line of work</b></p> <p>18 <b>Golden Spring New York is in?</b></p> <p>19 A Yes.</p> <p>20 <b>Q What does it do?</b></p> <p>21 A So it provides professional</p> <p>22 services within the US to multiple clients.</p> <p>23 <b>Q What do you mean by professional</b></p> <p>24 <b>services, what is that?</b></p> <p>25 A We just assist on various projects</p> <p style="text-align: right;">Page 123</p>	<p>1 A. COLUCCIO</p> <p>2 A I think that would be confidential</p> <p>3 between us and our clients.</p> <p>4 <b>Q You don't have to tell me who the</b></p> <p>5 <b>clients are. What category? Legal</b></p> <p>6 <b>services? Accounting?</b></p> <p>7 A Yes.</p> <p>8 <b>Q Okay. So the answer is yes to</b></p> <p>9 <b>legal services?</b></p> <p>10 A To both. Yes.</p> <p>11 <b>Q You said yes to accounting as</b></p> <p>12 <b>well?</b></p> <p>13 A Yes.</p> <p>14 <b>Q So is Golden Spring New York a law</b></p> <p>15 <b>firm?</b></p> <p>16 A No.</p> <p>17 MS. TESKE: Objection to the</p> <p>18 form of the question.</p> <p>19 <b>Q It provides the services of its</b></p> <p>20 <b>attorneys to clients?</b></p> <p>21 A I'm sorry. I don't understand the</p> <p>22 question.</p> <p>23 <b>Q Well, what -- legal services can</b></p> <p>24 <b>mean being a lawyer for somebody. Okay. It</b></p> <p>25 <b>might involve filings. So I'm going, again</b></p> <p style="text-align: right;">Page 125</p>

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<p>1 A. COLUCCIO</p> <p>2 I don't want you to go through individual</p> <p>3 cases. We're not going to spend our time on</p> <p>4 that today here.</p> <p>5 But what do you mean by legal</p> <p>6 services?</p> <p>7 MS. TESKE: Objection.</p> <p>8 <b>Q Just providing counsel in the</b></p> <p>9 <b>litigation or advising, giving legal advice?</b></p> <p>10 MS. TESKE: Object to the form</p> <p>11 of the question. I think the</p> <p>12 specifics are beyond the scope of</p> <p>13 the order?</p> <p>14 MR. GREIM: Yeah. That's why</p> <p>15 we're not going to go into the</p> <p>16 specifics.</p> <p>17 MS. TESKE: You are going into</p> <p>18 the specifics. You can answer, if</p> <p>19 you understand more specifically.</p> <p>20 A I don't understand more</p> <p>21 specifically.</p> <p>22 <b>Q You are a paralegal for this</b></p> <p>23 <b>entity, right?</b></p> <p>24 A Um-hmm.</p> <p>25 <b>Q Do you work in any non-litigation</b></p> <p style="text-align: right;">Page 126</p>	<p>1 A. COLUCCIO</p> <p>2 Spring provide any services to clients</p> <p>3 abroad outside the US?</p> <p>4 MS. TESKE: Objection to the</p> <p>5 form.</p> <p>6 A I think so.</p> <p>7 <b>Q In China?</b></p> <p>8 MS. TESKE: Object to the</p> <p>9 form.</p> <p>10 A I don't -- no, I don't think so.</p> <p>11 <b>Q Hong Kong?</b></p> <p>12 MS. TESKE: Object to the</p> <p>13 form.</p> <p>14 You can answer.</p> <p>15 A I'm not sure. Well, Eastern</p> <p>16 Profit is a Hong Kong company, so.</p> <p>17 <b>Q Well, that's true, that's a good</b></p> <p>18 <b>point. And does it provide services to some</b></p> <p>19 <b>British Virgin Island companies?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 A I'm not sure.</p> <p>23 <b>Q Is ACA a client of Golden Spring?</b></p> <p>24 MS. TESKE: Object.</p> <p>25 And don't answer.</p> <p style="text-align: right;">Page 128</p>
<p>1 A. COLUCCIO</p> <p>2 matters?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 A Yes.</p> <p>6 <b>Q Okay. Do you know of any client</b></p> <p>7 <b>at Golden Spring New York not related to Guo</b></p> <p>8 <b>Wengui?</b></p> <p>9 MS. TESKE: Object to the</p> <p>10 form.</p> <p>11 A I don't know.</p> <p>12 <b>Q We've got legal services, you've</b></p> <p>13 <b>got accounting services. What other</b></p> <p>14 <b>professional services does Golden Spring New</b></p> <p>15 <b>York render to clients in the US?</b></p> <p>16 A That's all I know of.</p> <p>17 <b>Q So are all the, is every single</b></p> <p>18 <b>one of the employees at Golden Spring New</b></p> <p>19 <b>York involved in either legal services or</b></p> <p>20 <b>accounting services?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 form.</p> <p>23 A We also have IT to assist with the</p> <p>24 rest of us.</p> <p>25 <b>Q Okay. All right. Does Golden</b></p> <p style="text-align: right;">Page 127</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Do you know the answer to the</b></p> <p>3 <b>question?</b></p> <p>4 MS. TESKE: Object.</p> <p>5 MR. GREIM: You don't have to</p> <p>6 tell me what the answer is. I only</p> <p>7 want to know whether the witness</p> <p>8 knows the answer to the question.</p> <p>9 MS. TESKE: Object.</p> <p>10 And tell the witness not the</p> <p>11 answer.</p> <p>12 MR. GREIM: I'm going to go</p> <p>13 ahead and mark an exhibit.</p> <p>14 (Whereupon, Declaration was</p> <p>15 marked as Golden Spring Exhibit</p> <p>16 3 for identification as of this</p> <p>17 date.)</p> <p>18 <b>Q How does Golden Spring New York</b></p> <p>19 <b>market itself as having business contacts</b></p> <p>20 <b>and expertise in China?</b></p> <p>21 MS. TESKE: Object to the form</p> <p>22 of the question.</p> <p>23 A I don't know.</p> <p>24 <b>Q How about Golden Spring Hong Kong,</b></p> <p>25 <b>its parent company, does it market itself as</b></p> <p style="text-align: right;">Page 129</p>

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<p>1 A. COLUCCIO</p> <p>2 having business expertise and contacts in</p> <p>3 China?</p> <p>4 MS. TESKE: Object to the</p> <p>5 scope. The witness is not here to</p> <p>6 talk about Golden Spring Hong Kong</p> <p>7 or China Golden Spring. She's here</p> <p>8 to talk about Golden Spring New</p> <p>9 York.</p> <p>10 <b>Q I'm going to show you what we're</b></p> <p>11 <b>marking as Exhibit Three. If you could look</b></p> <p>12 <b>at paragraph two, please.</b></p> <p>13 A Okay.</p> <p>14 <b>Q You'll see this a declaration of</b></p> <p>15 <b>Guo Wengui that he made out just a few</b></p> <p>16 <b>months ago. And he says, China Golden</b></p> <p>17 <b>Spring Group, Hong Kong Limited, China</b></p> <p>18 <b>Golden Spring, a Hong Kong company owned and</b></p> <p>19 <b>operated by my family, entered into a</b></p> <p>20 <b>consulting agreement with ACA investment</b></p> <p>21 <b>management limited, ACA, in January 2017. A</b></p> <p>22 <b>consulting agreement.</b></p> <p>23 <b>Now, it's true, is it not, that</b></p> <p>24 <b>Golden Spring New York's parent company is</b></p> <p>25 <b>owned and operated by Guo family, isn't it?</b></p> <p style="text-align: right;">Page 130</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q What do you mean by client?</b></p> <p>3 A That Golden Spring New York</p> <p>4 provides services to him.</p> <p>5 <b>Q For free or for pay?</b></p> <p>6 A I don't know.</p> <p>7 MS. TESKE: Object to the</p> <p>8 form.</p> <p>9 If you know.</p> <p>10 <b>Q Does Guo Wengui provide services</b></p> <p>11 <b>to Golden Spring New York?</b></p> <p>12 MS. TESKE: Object. Beyond</p> <p>13 the scope.</p> <p>14 You don't need to answer that.</p> <p>15 MR. GREIM: Well I'm afraid it</p> <p>16 is. Let's just take away any --</p> <p>17 <b>Q Does he provide services to Golden</b></p> <p>18 <b>Spring New York with respect to the contract</b></p> <p>19 <b>at issue here?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 You can answer.</p> <p>23 A The only thing I know that he had</p> <p>24 input on was initially when the contract was</p> <p>25 first being worked out when he gave help</p> <p style="text-align: right;">Page 132</p>
<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Objection to the</p> <p>3 form.</p> <p>4 And direct the witness not to</p> <p>5 answer.</p> <p>6 <b>Q You're going to take your</b></p> <p>7 <b>counsel's suggestion there?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Does Guo Wengui receive</b></p> <p>10 <b>partnership draws from Golden Spring?</b></p> <p>11 A I don't know.</p> <p>12 <b>Q Does he receive distributions from</b></p> <p>13 <b>Golden Spring?</b></p> <p>14 MS. TESKE: Asked and</p> <p>15 answered. Asked and answered.</p> <p>16 A I don't know.</p> <p>17 <b>Q What is Guo Wengui's relationship</b></p> <p>18 <b>to Golden Spring, Golden Spring New York?</b></p> <p>19 MS. TESKE: Asked and</p> <p>20 answered.</p> <p>21 A He's a client of Golden Spring New</p> <p>22 York.</p> <p>23 <b>Q So does he pay Golden Spring New</b></p> <p>24 <b>York for services?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 131</p>	<p>1 A. COLUCCIO</p> <p>2 with the list of names and some of the terms</p> <p>3 of the agreement. Other than that, I don't</p> <p>4 know.</p> <p>5 <b>Q Well, he flat out negotiated on</b></p> <p>6 <b>behalf of Eastern Profit, didn't he?</b></p> <p>7 MS. TESKE: Object to the form</p> <p>8 of the question. The witness isn't</p> <p>9 here to testify as to what Mr. Guo</p> <p>10 Wengui did on my behalf of Eastern</p> <p>11 Profit.</p> <p>12 MR. GREIM: I'm afraid that's</p> <p>13 wrong. If you look at topic three</p> <p>14 we need to know Golden Spring's</p> <p>15 dealings with Eastern Profit and Guo</p> <p>16 Wengui between January 1, '17 and</p> <p>17 July 1, 2019 as it relates to</p> <p>18 negotiation, execution or</p> <p>19 performance of the contract at</p> <p>20 issue.</p> <p>21 MS. TESKE: Yes. Golden</p> <p>22 Spring's activity. Not Mr. Kwok did</p> <p>23 on behalf of Eastern Profit.</p> <p>24 MR. GREIM: I see.</p> <p>25 <b>Q Let me ask you this, so Golden</b></p> <p style="text-align: right;">Page 133</p>

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<p>1 A. COLUCCIO</p> <p>2 Spring won't tell us today whether Guo</p> <p>3 Wengui negotiated on behalf of Eastern</p> <p>4 Profit?</p> <p>5 MS. TESKE: Objection to the</p> <p>6 form. That is not within the scope</p> <p>7 allowable by the Court and I've</p> <p>8 directed the witness not to answer.</p> <p>9 <b>Q Did Guo Wengui negotiate on behalf</b></p> <p>10 <b>of Golden Spring with Strategic Vision?</b></p> <p>11 MS. TESKE: Object to the</p> <p>12 form.</p> <p>13 You can answer.</p> <p>14 A No.</p> <p>15 <b>Q How do you know that?</b></p> <p>16 A From what I understand when he</p> <p>17 initially met with Wallop and Waller he was</p> <p>18 doing so on his own. Not on behalf of</p> <p>19 Golden Spring.</p> <p>20 <b>Q Okay. Now, where have you heard</b></p> <p>21 <b>that?</b></p> <p>22 MS. TESKE: Object to the</p> <p>23 form.</p> <p>24 You can answer.</p> <p>25 A In my conversation with Yvette.</p> <p style="text-align: right;">Page 134</p>	<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Asked and</p> <p>3 answered.</p> <p>4 A Because I know he's a client of</p> <p>5 Golden Spring.</p> <p>6 <b>Q Could he -- why does that mean he</b></p> <p>7 <b>can't control it as well?</b></p> <p>8 MS. TESKE: Object to the</p> <p>9 form. Argumentative?</p> <p>10 A I just know that's his</p> <p>11 relationship with Golden Spring. He is a</p> <p>12 client of Golden Spring and nothing else.</p> <p>13 <b>Q Okay. And who told you that?</b></p> <p>14 A Well, I've known that since I</p> <p>15 started working at Golden Spring.</p> <p>16 <b>Q I see. Okay. So what things have</b></p> <p>17 <b>you seen that indicate to you that Guo</b></p> <p>18 <b>Wengui is a client of Golden Spring,</b></p> <p>19 <b>exclusively a client of Golden Spring?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 You can answer, if you know.</p> <p>23 A I haven't necessarily seen things.</p> <p>24 It just in my conversations with other</p> <p>25 people at Golden Spring.</p> <p style="text-align: right;">Page 136</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q Is that in your notes?</b></p> <p>3 MS. TESKE: Object to the form</p> <p>4 of the question.</p> <p>5 You can answer, if you know.</p> <p>6 A I don't think so.</p> <p>7 <b>Q Did there come a time when Guo</b></p> <p>8 <b>Wengui began to negotiate on behalf of</b></p> <p>9 <b>Golden Spring?</b></p> <p>10 MS. TESKE: Asked and</p> <p>11 answered.</p> <p>12 You can answer.</p> <p>13 A I don't know. I don't, I don't</p> <p>14 know.</p> <p>15 <b>Q Who at Golden Spring knows the</b></p> <p>16 <b>answer to that question?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Does Guo Wengui control Golden</b></p> <p>19 <b>Spring?</b></p> <p>20 MS. TESKE: Asked and</p> <p>21 answered.</p> <p>22 A No.</p> <p>23 <b>Q Do you know that?</b></p> <p>24 A Yes.</p> <p>25 <b>Q How?</b></p> <p style="text-align: right;">Page 135</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q So has Guo Wengui told you that he</b></p> <p>3 <b>is a client and not an owner of Golden</b></p> <p>4 <b>Spring?</b></p> <p>5 MS. TESKE: Object to the</p> <p>6 scope of the question. You can</p> <p>7 answer.</p> <p>8 A No.</p> <p>9 <b>Q So what other people have told you</b></p> <p>10 <b>things that make you believe that Guo Wengui</b></p> <p>11 <b>is exclusively a client and not an owner of</b></p> <p>12 <b>Golden Spring?</b></p> <p>13 MS. TESKE: Object to the</p> <p>14 scope.</p> <p>15 But you can answer if you</p> <p>16 remember.</p> <p>17 A I can remember Yvette telling me</p> <p>18 that he's a client of Golden Spring.</p> <p>19 <b>Q In what matter? I guess let me</b></p> <p>20 <b>ask you this, what things is Golden Spring</b></p> <p>21 <b>doing for Mr. Guo Wengui?</b></p> <p>22 MS. TESKE: Object.</p> <p>23 And direct the witness not to</p> <p>24 answer.</p> <p>25 <b>Q So all we can get from you is</b></p> <p style="text-align: right;">Page 137</p>

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<p>1 A. COLUCCIO</p> <p>2 Yvette says he's a client.</p> <p>3 Have you worked on anything where it's</p> <p>4 been apparent to you that Guo Wengui is a client of</p> <p>5 Golden Spring?</p> <p>6 MS. TESKE: Object to the</p> <p>7 scope of the question.</p> <p>8 But you can answer.</p> <p>9 A Yes.</p> <p>10 <b>Q What was that?</b></p> <p>11 MS. TESKE: Object.</p> <p>12 And direct the witness not to</p> <p>13 answer.</p> <p>14 <b>Q What's your understanding of what</b></p> <p>15 <b>it means for someone to be a client of</b></p> <p>16 <b>Golden Spring?</b></p> <p>17 A That Golden Spring provides</p> <p>18 services to them.</p> <p>19 <b>Q And is that inconsistent with the</b></p> <p>20 <b>recipient of the services also being an</b></p> <p>21 <b>owner of Golden Spring?</b></p> <p>22 A I'm sorry. Could you repeat that.</p> <p>23 <b>Q Sure. Is Golden Spring's</b></p> <p>24 <b>provision of services for someone</b></p> <p>25 <b>inconsistent with that person also owning</b></p> <p style="text-align: right;">Page 138</p>	<p>1 A. COLUCCIO</p> <p>2 he's a client of Golden Spring.</p> <p>3 MR. GREIM: Just so we're</p> <p>4 clear every now and then Ms. Teske</p> <p>5 we're not going to allow that, just</p> <p>6 for the record that means you're</p> <p>7 instructing the witness not answer,</p> <p>8 correct?</p> <p>9 MS. TESKE: I'm saying that</p> <p>10 it's outside of the scope of the</p> <p>11 order, and I am directing the</p> <p>12 witness not to answer.</p> <p>13 MR. GREIM: Okay. Very good.</p> <p>14 <b>Q Now, when Mr. Guo provided advice</b></p> <p>15 <b>to Golden Spring New York on this contract,</b></p> <p>16 <b>was he doing that as a client of Golden</b></p> <p>17 <b>Spring New York. Or was he doing it as an</b></p> <p>18 <b>adviser to Golden Spring New York?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't know.</p> <p>22 <b>Q Does Golden Spring New York know?</b></p> <p>23 A I don't know.</p> <p>24 <b>Q Is there any written agreement</b></p> <p>25 <b>between Guo Wengui and Golden Spring New</b></p> <p style="text-align: right;">Page 140</p>
<p>1 A. COLUCCIO</p> <p>2 Golden Spring?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 You can answer?</p> <p>6 A I don't know.</p> <p>7 <b>Q The two things could both be true,</b></p> <p>8 <b>couldn't they?</b></p> <p>9 MS. TESKE: Object to the</p> <p>10 form.</p> <p>11 You can answer.</p> <p>12 A I don't know.</p> <p>13 <b>Q So no one has ever told you that</b></p> <p>14 <b>Guo Wengui is not an owner of Golden Spring</b></p> <p>15 <b>New York, have they?</b></p> <p>16 MS. TESKE: Object to the</p> <p>17 form.</p> <p>18 You can answer.</p> <p>19 A Is not an owner. I don't remember</p> <p>20 if anyone specifically said those words to</p> <p>21 me. I don't remember.</p> <p>22 <b>Q Rather what they've told you is</b></p> <p>23 <b>Guo Wengui is a client of Golden Spring,</b></p> <p>24 <b>correct?</b></p> <p>25 A Right. I. have been told that</p> <p style="text-align: right;">Page 139</p>	<p>1 A. COLUCCIO</p> <p>2 York?</p> <p>3 A I don't know.</p> <p>4 <b>Q Is there any writing of any kind</b></p> <p>5 <b>explaining what Guo Wengui was supposed to</b></p> <p>6 <b>be doing with respect to the research</b></p> <p>7 <b>agreement?</b></p> <p>8 A I don't know.</p> <p>9 <b>Q So you've testified that Golden</b></p> <p>10 <b>Spring New York was working under this power</b></p> <p>11 <b>of attorney for Eastern Profit.</b></p> <p>12 <b>And so my question to you is was</b></p> <p>13 <b>Guo Wengui working alongside of Golden</b></p> <p>14 <b>Spring as yet another agent for Eastern</b></p> <p>15 <b>Profit, or was Guo working on the research</b></p> <p>16 <b>agreement as an agent of Golden Spring?</b></p> <p>17 MS. TESKE: I'm sorry, can you</p> <p>18 read that back to me.</p> <p>19 <b>Q Does the witness understand the</b></p> <p>20 <b>question?</b></p> <p>21 MS. TESKE: But I need to</p> <p>22 understand it in order to know if I</p> <p>23 am objecting to it.</p> <p>24 (Whereupon, the requested</p> <p>25 testimony was read by the court</p> <p style="text-align: right;">Page 141</p>

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<p>1 A. COLUCCIO  2 reporter.)  3 MS. TESKE: Object to the form  4 of the question.  5 Again the witness is not here  6 to testify as in what capacity Guo  7 Wengui was working except to the  8 extent that it was on behalf of  9 GSNY.  10 You can answer.  11 A I don't know.  12 <b>Q Well, does Golden Spring know</b>  13 <b>whether Guo Wengui was working as its agent</b>  14 <b>when he was interacting with Strategic</b>  15 <b>Vision on the research agreement?</b>  16 MS. TESKE: Object to the  17 form.  18 You can answer.  19 A I believe he was working as an  20 agent of Golden Spring.  21 <b>Q Okay. Why do you believe that?</b>  22 A I think that's something that I've  23 learned but.  24 <b>Q What about when Golden Spring, I'm</b>  25 <b>sorry, when Strategic Vision started to do</b></p> <p style="text-align: right;">Page 142</p>	<p>1 A. COLUCCIO  2 Strategic Vision on the contract?  3 MS. TESKE: Object to the  4 form.  5 A I'm not sure.  6 <b>Q Does Golden Spring know the answer</b>  7 <b>to that question?</b>  8 A I don't know.  9 <b>Q Well, let me ask you this, was Guo</b>  10 <b>Wengui acting as the principal, the</b>  11 <b>controller of Golden Spring for purposes of</b>  12 <b>evaluating Strategic Vision's performance</b>  13 <b>under the agreement?</b>  14 MS. TESKE: Asked and  15 answered.  16 You can answer.  17 A I don't know.  18 <b>Q Does Golden Spring know the answer</b>  19 <b>to that question?</b>  20 A I don't know.  21 <b>Q Did Golden Spring report back to</b>  22 <b>Eastern Profit on the results of Strategic</b>  23 <b>Vision's research?</b>  24 A I believe in the beginning, yes.  25 <b>Q What do you mean by in the</b></p> <p style="text-align: right;">Page 144</p>
<p>1 A. COLUCCIO  2 work on the agreement, what role did Guo  3 Wengui play at that point?  4 MS. TESKE: Object to the  5 scope.  6 The witness is not here to  7 testify as Mr. Guo Wengui's role.  8 She is here to GSNY's role and  9 GSNY's communication with Guo Wengui  10 as it concerns the contract.  11 A I don't know.  12 MS. TESKE: Direct the witness  13 not to answer.  14 <b>Q Did he play a role at Golden</b>  15 <b>Spring for purposes of evaluating the</b>  16 <b>performance of Strategic Vision on the</b>  17 <b>contract?</b>  18 MS. TESKE: Object to the  19 form.  20 You can answer.  21 A Sorry, can you repeat the  22 question.  23 <b>Q Sure. Did Guo Wengui act as an</b>  24 <b>agent for Golden Spring New York for</b>  25 <b>purposes of evaluating the performance of</b></p> <p style="text-align: right;">Page 143</p>	<p>1 A. COLUCCIO  2 beginning?  3 A Maybe in the first few months  4 after the contract was signed.  5 <b>Q By the way, how long was the</b>  6 <b>contract in effect?</b>  7 A I don't know.  8 <b>Q Who terminated the contract?</b>  9 MS. TESKE: These questions  10 have been asked and answered.  11 But you can answer, if you  12 know.  13 A I don't know.  14 <b>Q Who's decision was it to terminate</b>  15 <b>the contract?</b>  16 A I don't know.  17 <b>Q Was it Golden Spring's decision?</b>  18 A I don't know.  19 <b>Q Was it Guo Wengui's decision?</b>  20 A I don't know.  21 <b>Q I do have to direct you to Exhibit</b>  22 <b>A. If you could look at topic ten. You see</b>  23 <b>there, what's that say?</b>  24 A "Eastern's termination of the  25 agreement."</p> <p style="text-align: right;">Page 145</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q What do you know about Eastern's</b></p> <p>3 <b>termination of the agreement?</b></p> <p>4 MS. TESKE: The witness is not</p> <p>5 here to testify about Eastern. The</p> <p>6 witness is here to testify about</p> <p>7 Golden Spring pursuant to the</p> <p>8 Court's order.</p> <p>9 MR. GREIM: Golden Spring was</p> <p>10 also to testify to the topics that</p> <p>11 were agreed to between Eastern</p> <p>12 Profit and Strategic Vision?</p> <p>13 MS. TESKE: That is, I</p> <p>14 disagree with the interpretation of</p> <p>15 the order, and that she was not</p> <p>16 prepared in that capacity.</p> <p>17 MR. GREIM: Well, that cuts</p> <p>18 out a lot of the questions.</p> <p>19 <b>Q What special expertise did Golden</b></p> <p>20 <b>Spring bring to the evaluation of Strategic</b></p> <p>21 <b>Vision's work under this contract?</b></p> <p>22 MS. TESKE: Object to the</p> <p>23 form.</p> <p>24 You can answer?</p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 146</p>	<p>1 A. COLUCCIO</p> <p>2 on the contract; is that right?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 You can answer.</p> <p>6 A I don't know.</p> <p>7 <b>Q Well, is Golden Spring, or I guess</b></p> <p>8 <b>I should ask you this, was Golden Spring</b></p> <p>9 <b>keeping track of the time and cost it</b></p> <p>10 <b>expended on its work on behalf of Eastern</b></p> <p>11 <b>Profit?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Is that one of your jobs?</b></p> <p>14 A No.</p> <p>15 <b>Q Do you keep your time, by the way?</b></p> <p>16 A No.</p> <p>17 <b>Q Now, did Guo Wengui work on under</b></p> <p>18 <b>the direction of Yvette Wang?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 A Not that I know of.</p> <p>22 <b>Q Did he work under the direction of</b></p> <p>23 <b>Han Chunguang?</b></p> <p>24 MS. TESKE: Object to the</p> <p>25 form. That's beyond the scope.</p> <p style="text-align: right;">Page 148</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q Do you know what Golden Spring's</b></p> <p>3 <b>out-of-pocket cost have been in working on</b></p> <p>4 <b>the negotiation and the performance of the</b></p> <p>5 <b>contract and overseeing the litigation on</b></p> <p>6 <b>the contract?</b></p> <p>7 A No.</p> <p>8 <b>Q Do you know if it has</b></p> <p>9 <b>out-of-pocket cost?</b></p> <p>10 A No.</p> <p>11 <b>Q Do you know who's paying Golden</b></p> <p>12 <b>Spring, if anyone -- let me go back. I</b></p> <p>13 <b>think you've already answered that question.</b></p> <p>14 <b>Is it Golden Spring's</b></p> <p>15 <b>understanding that if the contract is</b></p> <p>16 <b>successful it will be paid for all its time</b></p> <p>17 <b>and out-of-pocket cost on this?</b></p> <p>18 MS. TESKE: Objection to the</p> <p>19 form.</p> <p>20 A It's my understanding that Golden</p> <p>21 Spring is aware that they would be</p> <p>22 compensated by Eastern Profit if the</p> <p>23 agreement was successful.</p> <p>24 <b>Q At this point though Golden Spring</b></p> <p>25 <b>New York knows it will never be compensated</b></p> <p style="text-align: right;">Page 147</p>	<p>1 A. COLUCCIO</p> <p>2 Whether or not Guo Wengui</p> <p>3 worked under the direction of</p> <p>4 Eastern Profit or Han Chunguang is</p> <p>5 not why GSNY is here to testify, nor</p> <p>6 would it have that knowledge. It's</p> <p>7 outside the scope of the Court's</p> <p>8 order.</p> <p>9 MR. GREIM: I think it</p> <p>10 actually does have knowledge, but</p> <p>11 you don't need to be suggesting</p> <p>12 answers to the witness.</p> <p>13 MS. TESKE: It is outside the</p> <p>14 Court's order.</p> <p>15 MR. GREIM: Because one of the</p> <p>16 topics is Golden Spring's dealings</p> <p>17 with Eastern Profit and Guo Wengui</p> <p>18 that relate to negotiation,</p> <p>19 execution or performance of the</p> <p>20 contract --</p> <p>21 MS. TESKE: Yes, and what you</p> <p>22 --</p> <p>23 MR. GREIM: And in those</p> <p>24 dealings it may well have noticed</p> <p>25 what Guo Wengui was doing, and</p> <p style="text-align: right;">Page 149</p>

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<p>1 A. COLUCCIO</p> <p>2 that's what I'm --</p> <p>3 MS. TESKE: Which is beyond</p> <p>4 the scope of the order. Because the</p> <p>5 order limits the topics to GSNY's</p> <p>6 work and communications with Guo</p> <p>7 Wengui and Eastern in connection</p> <p>8 with the contract. It is not broad</p> <p>9 enough to encompass how Guo Wengui</p> <p>10 was acting.</p> <p>11 MR. GREIM: I see. So GSNY</p> <p>12 says it cannot testify about what it</p> <p>13 observed Guo Wengui doing, that's</p> <p>14 outside the scope?</p> <p>15 MS. TESKE: It is beyond the</p> <p>16 scope.</p> <p>17 MR. GREIM: Okay.</p> <p>18 MS. TESKE: Unless -- yeah it</p> <p>19 is beyond the scope.</p> <p>20 MR. GREIM: All right.</p> <p>21 Disagree with you. We'll just meet</p> <p>22 and confer when we're done.</p> <p>23 <b>Q Why was Golden Spring New York</b></p> <p>24 <b>willing to take on the role of acting as an</b></p> <p>25 <b>agent for Eastern Profit?</b></p> <p style="text-align: right;">Page 150</p>	<p>1 A. COLUCCIO</p> <p>2 A No.</p> <p>3 <b>Q What was Golden Spring expecting</b></p> <p>4 <b>to gain out of this contract?</b></p> <p>5 A Information on the CCP.</p> <p>6 <b>Q How did it intend to use that</b></p> <p>7 <b>information?</b></p> <p>8 A I don't know.</p> <p>9 <b>Q And does Golden Spring do any work</b></p> <p>10 <b>whatsoever in which the information would be</b></p> <p>11 <b>useful?</b></p> <p>12 MS. TESKE: Object to the</p> <p>13 form.</p> <p>14 A I don't know.</p> <p>15 <b>Q When you were hired did you</b></p> <p>16 <b>understand that you were going to be working</b></p> <p>17 <b>with an entity that was going to be doing</b></p> <p>18 <b>battle with the CCP?</b></p> <p>19 MS. TESKE: Object to the form</p> <p>20 of the question.</p> <p>21 A Not doing battle.</p> <p>22 <b>Q Well, okay. Is working against</b></p> <p>23 <b>the CCP one of Golden Spring New York's</b></p> <p>24 <b>business purposes?</b></p> <p>25 MS. TESKE: Object to the form</p> <p style="text-align: right;">Page 152</p>
<p>1 A. COLUCCIO</p> <p>2 A Because Golden Spring also had an</p> <p>3 interest in doing this research.</p> <p>4 <b>Q Okay. Was that interest on behalf</b></p> <p>5 <b>of a client to whom it was rendering</b></p> <p>6 <b>professional services?</b></p> <p>7 MS. TESKE: Object to the</p> <p>8 form.</p> <p>9 You can answer.</p> <p>10 A I don't think so. I think it was</p> <p>11 just on behalf of the company.</p> <p>12 <b>Q The company itself had an interest</b></p> <p>13 <b>in doing this. So the company -- okay.</b></p> <p>14 <b>Well, I have to ask you, why would</b></p> <p>15 <b>a New York based entity care about taking on</b></p> <p>16 <b>the CCP?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 form.</p> <p>19 But you can answer.</p> <p>20 A I don't know.</p> <p>21 <b>Q Golden Spring doesn't know why its</b></p> <p>22 <b>interested on taking on the CCP?</b></p> <p>23 MS. TESKE: Object to the</p> <p>24 form.</p> <p>25 You can answer.</p> <p style="text-align: right;">Page 151</p>	<p>1 A. COLUCCIO</p> <p>2 of the question.</p> <p>3 You can answer.</p> <p>4 A I don't think so.</p> <p>5 <b>Q Does Golden Spring New York do</b></p> <p>6 <b>anything else like what it did here with</b></p> <p>7 <b>Eastern Profit and Strategic Vision?</b></p> <p>8 MS. TESKE: Object to the form</p> <p>9 of the question.</p> <p>10 But you can answer.</p> <p>11 A I don't know.</p> <p>12 <b>Q And did Golden Spring have any</b></p> <p>13 <b>role in deciding whether Strategic Vision</b></p> <p>14 <b>was capable of performing the work that was</b></p> <p>15 <b>contracted for under the agreement?</b></p> <p>16 MS. TESKE: Object to the</p> <p>17 form.</p> <p>18 You can answer.</p> <p>19 A Yes.</p> <p>20 <b>Q What did it do?</b></p> <p>21 A So after Yvette was introduced to</p> <p>22 Waller and Wallop, she had further</p> <p>23 discussions with them about research.</p> <p>24 <b>Q Were all of those discussions in</b></p> <p>25 <b>her capacity as president of Golden Spring</b></p> <p style="text-align: right;">Page 153</p>

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<p>1 A. COLUCCIO</p> <p>2 New York?</p> <p>3 A I believe so.</p> <p>4 <b>Q Did Golden Spring ultimately</b></p> <p>5 <b>recommend to Eastern Profit that it should</b></p> <p>6 <b>enter into the contract with Strategic</b></p> <p>7 <b>Vision?</b></p> <p>8 MS. TESKE: Object to the form</p> <p>9 of the question.</p> <p>10 You can answer.</p> <p>11 A I'm not sure whether they</p> <p>12 recommended, but I know that Yvette told</p> <p>13 Mr. Han, you know, what she had found out</p> <p>14 about Strategic Vision. She relayed</p> <p>15 information from her discussions with Waller</p> <p>16 and Wallop to Mr. Han.</p> <p>17 <b>Q When was that?</b></p> <p>18 A Her conversation with Mr. Han? At</p> <p>19 the end of the 2017.</p> <p>20 <b>Q So this was after her first</b></p> <p>21 <b>discussion with Mr. Han, or was this --</b></p> <p>22 A I'm only talking about one</p> <p>23 discussion with Mr. Han.</p> <p>24 <b>Q I see.</b></p> <p>25 A At the end of 2017.</p> <p style="text-align: right;">Page 154</p>	<p>1 A. COLUCCIO</p> <p>2 entities?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 A I don't know.</p> <p>6 <b>Q Why did Golden Spring several</b></p> <p>7 <b>months into this litigation decide -- well,</b></p> <p>8 <b>let me ask you this.</b></p> <p>9 <b>Who drafted the limited power of</b></p> <p>10 <b>attorney that we looked at?</b></p> <p>11 MS. TESKE: Asked and</p> <p>12 answered.</p> <p>13 A I don't know.</p> <p>14 <b>Q During the course of this case --</b></p> <p>15 <b>I guess we better go since you've been here.</b></p> <p>16 <b>What'd you say five months?</b></p> <p>17 A About seven months.</p> <p>18 <b>Q Have you played any role in</b></p> <p>19 <b>gathering documents to be produced in this</b></p> <p>20 <b>case?</b></p> <p>21 A No.</p> <p>22 <b>Q Did Golden Spring make any efforts</b></p> <p>23 <b>to help Eastern Profit find a way to pay for</b></p> <p>24 <b>the research agreement?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 156</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q So in a discussion where she went</b></p> <p>3 <b>to Mr. Han and said, hey, I've got this</b></p> <p>4 <b>research project, that's also where she</b></p> <p>5 <b>conveyed the contents of her discussions</b></p> <p>6 <b>with Wallop and Waller?</b></p> <p>7 A I believe so, or yeah, whatever</p> <p>8 discussions she had had up until that point.</p> <p>9 <b>Q Didn't Chunguang Han meet Waller</b></p> <p>10 <b>and Wallop in Yvette Wang's presence?</b></p> <p>11 A I don't know.</p> <p>12 MS. TESKE: Object to the</p> <p>13 form.</p> <p>14 <b>Q Has Golden Spring served as a</b></p> <p>15 <b>litigation power of attorney for any entity</b></p> <p>16 <b>before serving in that role for Eastern</b></p> <p>17 <b>Profit in this case?</b></p> <p>18 MS. TESKE: Object to the form</p> <p>19 of the question. Asked and</p> <p>20 answered.</p> <p>21 You can answer.</p> <p>22 A I don't know.</p> <p>23 <b>Q Does Golden Spring have any</b></p> <p>24 <b>special skills or experience in serving as a</b></p> <p>25 <b>litigation power of attorney for other</b></p> <p style="text-align: right;">Page 155</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Did Golden Spring help Eastern</b></p> <p>3 <b>Profit negotiate a loan agreement with</b></p> <p>4 <b>Eastern Profit?</b></p> <p>5 A I don't know.</p> <p>6 <b>Q I think I just said that the wrong</b></p> <p>7 <b>way, so your I don't know is clear.</b></p> <p>8 <b>Did Golden Spring New York help</b></p> <p>9 <b>Eastern Profit negotiate a loan agreement</b></p> <p>10 <b>with ACA?</b></p> <p>11 MS. TESKE: Object. Beyond</p> <p>12 the scope.</p> <p>13 But you can answer.</p> <p>14 A I don't know.</p> <p>15 <b>Q Did Golden Spring New York get</b></p> <p>16 <b>drafts of the loan agreement between Eastern</b></p> <p>17 <b>Profit and ACA?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q Does it have any drafts on its</b></p> <p>20 <b>email system?</b></p> <p>21 MS. TESKE: Object. Beyond</p> <p>22 the scope.</p> <p>23 A I don't know.</p> <p>24 <b>Q Who does Golden Spring report to</b></p> <p>25 <b>at Eastern Profit regarding this litigation?</b></p> <p style="text-align: right;">Page 157</p>

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<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Beyond the scope.</p> <p>3 But you can answer, if you</p> <p>4 know.</p> <p>5 A I don't know.</p> <p>6 <b>Q Do you know who chose you to be</b></p> <p>7 <b>the 30B6 witness today?</b></p> <p>8 MS. TESKE: Objection to the</p> <p>9 form.</p> <p>10 A No.</p> <p>11 <b>Q Has Eastern Profit assigned its</b></p> <p>12 <b>claim to Golden Spring New York.</b></p> <p>13 MS. TESKE: Objection to the</p> <p>14 form.</p> <p>15 If you know, you can answer.</p> <p>16 It's beyond the scope, and</p> <p>17 it's a legal question, but you can</p> <p>18 answer?</p> <p>19 A I don't know.</p> <p>20 <b>Q Did Golden Spring, Eastern Profit,</b></p> <p>21 <b>Guo Wengui have any understanding as to the</b></p> <p>22 <b>role of each person or entity in the</b></p> <p>23 <b>negotiation of the contract at issue?</b></p> <p>24 MS. TESKE: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 158</p>	<p>1 A. COLUCCIO</p> <p>2 to ensure that Guo Wengui would keep</p> <p>3 information related to the contract</p> <p>4 confidential?</p> <p>5 A I don't know.</p> <p>6 <b>Q Did it take any steps to ensure</b></p> <p>7 <b>that Eastern Profit would keep information</b></p> <p>8 <b>related to the contract confidential?</b></p> <p>9 A I don't know.</p> <p>10 <b>Q Who was in charge of making that,</b></p> <p>11 <b>whatever research results were generated</b></p> <p>12 <b>were actually used for the purposes that Mr.</b></p> <p>13 <b>Wengui represented to Strategic Vision?</b></p> <p>14 MS. TESKE: Objection to the</p> <p>15 form.</p> <p>16 But you can answer.</p> <p>17 A I don't know.</p> <p>18 <b>Q Did Golden Spring ever express any</b></p> <p>19 <b>concern to Eastern Profit or Guo Wengui</b></p> <p>20 <b>about the truthfulness of Guo Wengui's</b></p> <p>21 <b>representations to Strategic Vision?</b></p> <p>22 A I don't know.</p> <p>23 <b>Q Did Golden Spring ever express any</b></p> <p>24 <b>concern to either Eastern Profit or Guo</b></p> <p>25 <b>Wengui about the failure to disclose Eastern</b></p> <p style="text-align: right;">Page 160</p>
<p>1 A. COLUCCIO</p> <p>2 A Did the three of them together?</p> <p>3 <b>Q Sure.</b></p> <p>4 A I don't know.</p> <p>5 <b>Q Did the three of them together</b></p> <p>6 <b>have any understanding as to their</b></p> <p>7 <b>respective roles with respect to the</b></p> <p>8 <b>execution of the contract at issue?</b></p> <p>9 MS. TESKE: Same objection.</p> <p>10 You can answer.</p> <p>11 A I don't know.</p> <p>12 <b>Q Did the three of them have any</b></p> <p>13 <b>understanding with respect to the</b></p> <p>14 <b>performance of the contract at issue?</b></p> <p>15 MS. TESKE: Same objection.</p> <p>16 A I don't know.</p> <p>17 <b>Q Who's job was it to keep</b></p> <p>18 <b>information related to the contract</b></p> <p>19 <b>confidential?</b></p> <p>20 A I don't know.</p> <p>21 <b>Q Did Golden Spring have that duty?</b></p> <p>22 MS. TESKE: Objection.</p> <p>23 You can answer.</p> <p>24 A I don't know.</p> <p>25 <b>Q Did Golden Spring take any steps</b></p> <p style="text-align: right;">Page 159</p>	<p>1 A. COLUCCIO</p> <p>2 Profit's interest in the contract to</p> <p>3 Strategic Vision?</p> <p>4 MS. TESKE: Objection to the</p> <p>5 form.</p> <p>6 A I don't know.</p> <p>7 <b>Q In fact, did Golden Spring even</b></p> <p>8 <b>understand what Eastern Profit intended to</b></p> <p>9 <b>use the research for?</b></p> <p>10 MS. TESKE: Objection to the</p> <p>11 form.</p> <p>12 A I don't know.</p> <p>13 <b>Q Did Golden Spring understand who</b></p> <p>14 <b>at Eastern Profit had authority to make sure</b></p> <p>15 <b>that the research was used for the purposes</b></p> <p>16 <b>set forth under the agreement?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 form.</p> <p>19 You can answer.</p> <p>20 A I don't know.</p> <p>21 <b>Q Did Golden Spring New York have</b></p> <p>22 <b>any concerns that Guo Wengui's</b></p> <p>23 <b>representations to be opposed to the</b></p> <p>24 <b>Communist regime were untruthful?</b></p> <p>25 MS. TESKE: Object to the form</p> <p style="text-align: right;">Page 161</p>

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<p>1 A. COLUCCIO</p> <p>2 of the question.</p> <p>3 A No, not that I know of.</p> <p>4 <b>Q Did you discuss that topic with</b></p> <p>5 <b>Yvette Wang last night?</b></p> <p>6 A No.</p> <p>7 <b>Q Is Golden Spring New York aware of</b></p> <p>8 <b>Strategic Vision's allegations in this case</b></p> <p>9 <b>that Guo Wengui was not who he represented</b></p> <p>10 <b>to be?</b></p> <p>11 MS. TESKE: Object. It's</p> <p>12 beyond the scope.</p> <p>13 But you can answer.</p> <p>14 A Yes.</p> <p>15 <b>Q And my question now is, in its</b></p> <p>16 <b>dealings with Eastern Profit and Guo Wengui,</b></p> <p>17 <b>did Golden Spring have any concern -- I'm</b></p> <p>18 <b>sorry -- did it share the concerns that</b></p> <p>19 <b>Strategic Vision has articulated in its</b></p> <p>20 <b>counter claim?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 form.</p> <p>23 You can answer.</p> <p>24 A No, not that I know of.</p> <p>25 <b>Q Did you speak with Yvette Wang</b></p> <p style="text-align: right;">Page 162</p>	<p>1 A. COLUCCIO</p> <p>2 making to Strategic Vision were true?</p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 A I don't know.</p> <p>6 <b>Q Was it important to Golden Spring</b></p> <p>7 <b>to make sure that Guo Wengui's</b></p> <p>8 <b>representations to Strategic Vision were</b></p> <p>9 <b>true?</b></p> <p>10 A Yes.</p> <p>11 <b>Q What did it do to make sure they</b></p> <p>12 <b>were in fact true.</b></p> <p>13 A I don't know.</p> <p>14 <b>Q Does Golden Spring have any notes</b></p> <p>15 <b>of its dealings with Eastern Profit and Guo</b></p> <p>16 <b>Wengui throughout the negotiation, execution</b></p> <p>17 <b>and performance of the contract at issue?</b></p> <p>18 A I don't know.</p> <p>19 <b>Q Who knows the answer to that</b></p> <p>20 <b>question?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q What were Golden Spring's duties</b></p> <p>23 <b>in serving as Eastern Profit's agent for</b></p> <p>24 <b>purposes of handling the ACA loan?</b></p> <p>25 A I don't know.</p> <p style="text-align: right;">Page 164</p>
<p>1 A. COLUCCIO</p> <p>2 about this last night?</p> <p>3 A No.</p> <p>4 <b>Q I have to ask you, have you read</b></p> <p>5 <b>the counterclaim in this case by Strategic</b></p> <p>6 <b>Vision?</b></p> <p>7 A I don't think I read the full</p> <p>8 pleading.</p> <p>9 <b>Q All right. Well, Golden Spring</b></p> <p>10 <b>owed duties to Guo Wengui because, as you</b></p> <p>11 <b>said, he was a client of Golden Spring; is</b></p> <p>12 <b>that right?</b></p> <p>13 MS. TESKE: That's a legal</p> <p>14 question. It's beyond scope.</p> <p>15 But you can answer?</p> <p>16 A Right he is a client of Golden</p> <p>17 Spring.</p> <p>18 <b>Q Did Golden Spring feel that it</b></p> <p>19 <b>could independently investigate the claims</b></p> <p>20 <b>Guo Wengui was making to Strategic Vision?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 form.</p> <p>23 A I don't know.</p> <p>24 <b>Q Well, did Golden Spring know</b></p> <p>25 <b>whether the representations Guo Wengui was</b></p> <p style="text-align: right;">Page 163</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q By the way, didn't Golden Spring</b></p> <p>3 <b>owe a duty to Eastern Profit to make sure</b></p> <p>4 <b>that Guo's representations were true?</b></p> <p>5 MS. TESKE: Object to the form</p> <p>6 of the question. That's a legal</p> <p>7 question not a factual question for</p> <p>8 the witness to answer.</p> <p>9 But if you understand, you can</p> <p>10 answer, if you know.</p> <p>11 A I don't know.</p> <p>12 <b>Q Did Golden Spring think it owed a</b></p> <p>13 <b>duty to its principal Eastern Profit to make</b></p> <p>14 <b>sure that Guo's representations to Strategic</b></p> <p>15 <b>Vision were true?</b></p> <p>16 MS. TESKE: Objection to the</p> <p>17 form.</p> <p>18 You can answer.</p> <p>19 A I would think so.</p> <p>20 MR. GREIM: We'll go ahead and</p> <p>21 take a break.</p> <p>22 VIDEOGRAPHER: The time is</p> <p>23 12:27 p.m. Tuesday November 11,</p> <p>24 2019. This is the end of media tape</p> <p>25 number two in the videotaped</p> <p style="text-align: right;">Page 165</p>

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<p>1 A. COLUCCIO  2 deposition of Ms. Amelia Coluccio.  3 We're off the record.  4 (Whereupon, a recess was taken  5 from 12:27 p.m. to 12:45 p.m.)  6 VIDEOGRAPHER: The time is  7 12:45 p.m. Tuesday November  8 12, 2019. This is media number  9 three of the videotape deposition of  10 Ms. Amelia Coluccio.  11 We are back on the record.  12 <b>Q Ms. Coluccio do you currently work</b>  13 <b>for the Keefe Law Firm as well?</b>  14 A No.  15 <b>Q Was that the former firm that you</b>  16 <b>had worked at before coming to Golden</b>  17 <b>Spring?</b>  18 A Yes.  19 <b>Q And just to be clear, you have no</b>  20 <b>other employers now; is that right?</b>  21 A Correct.  22 <b>Q Did Golden Spring -- we talked</b>  23 <b>earlier about not just Golden Spring's</b>  24 <b>negotiation with Strategic Vision, but also</b>  25 <b>its advice to Eastern Profit regarding this</b></p> <p style="text-align: right;">Page 166</p>	<p>1 A. COLUCCIO  2 whole thing. I want to use our time wisely  3 here.  4 You didn't review it in  5 preparation for your testimony?  6 A No.  7 <b>Q Didn't review any documents, did</b>  8 <b>you?</b>  9 A No.  10 <b>Q So is Golden Spring aware that</b>  11 <b>Eastern Profit is doing business in the</b>  12 <b>United States?</b>  13 A I don't know.  14 <b>Q Let's talk a little bit more.</b>  15 <b>Well okay, here's another question. Is</b>  16 <b>Golden Spring's limited power of attorney</b>  17 <b>still in effect for Eastern Profit?</b>  18 MS. TESKE: Object.  19 These are all legal questions,  20 but you can go ahead and answer.  21 A I don't know.  22 <b>Q Has it been modified?</b>  23 A I don't know.  24 <b>Q Is there an amended power of</b>  25 <b>attorney out there somewhere?</b></p> <p style="text-align: right;">Page 168</p>
<p>1 A. COLUCCIO  2 contract.  3 And so my question is, did Golden  4 Spring know that Eastern Profit was a Hong  5 Kong entity?  6 MS. TESKE: Object to the  7 form.  8 You can answer.  9 A Yes, I believe so.  10 <b>Q Did Golden Spring advise Eastern</b>  11 <b>Profit that it ought to register to do</b>  12 <b>business in the US before hiring Golden</b>  13 <b>Spring to do this work for it here?</b>  14 A I don't know.  15 <b>Q Did it advise Eastern Profit that</b>  16 <b>it should register in the US before hiring</b>  17 <b>Strategic Vision to do work?</b>  18 A I don't know.  19 <b>Q Well, where was the work under the</b>  20 <b>research agreement to be performed?</b>  21 A I don't know.  22 <b>Q Well now, have you ever seen the</b>  23 <b>research agreement?</b>  24 A I don't think so.  25 <b>Q Well, we won't go through the</b></p> <p style="text-align: right;">Page 167</p>	<p>1 A. COLUCCIO  2 A Not that I know of.  3 <b>Q Does Golden Spring New York have</b>  4 <b>an office in Hong Kong?</b>  5 A Golden Spring New York, no, that I  6 know of.  7 <b>Q Where is its parent company's</b>  8 <b>office in Hong Kong?</b>  9 MS. TESKE: Object. Beyond  10 the scope.  11 If you know.  12 A I don't know.  13 <b>Q Is it at Bank of China tower?</b>  14 A I don't know.  15 MS. TESKE: Asked and  16 answered. Same objection.  17 <b>Q Do you know whether Eastern Profit</b>  18 <b>and Golden Spring's parent company actually</b>  19 <b>share an office in Hong Kong?</b>  20 A I don't know.  21 MS. TESKE: Same objection.  22 <b>Q Does Golden Spring New York have</b>  23 <b>employees who work remotely?</b>  24 MS. TESKE: Asked and  25 answered.</p> <p style="text-align: right;">Page 169</p>

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<p>1 A. COLUCCIO</p> <p>2 You can answer.</p> <p>3 A Not that I know of.</p> <p>4 <b>Q Does Golden Spring New York -- I</b></p> <p>5 <b>think we talked about its offices at 162</b></p> <p>6 <b>East 64 Street right now?</b></p> <p>7 A Right.</p> <p>8 <b>Q Most of your time that's where</b></p> <p>9 <b>you've been working, right?</b></p> <p>10 A Right.</p> <p>11 <b>Q Who pays its rent for that spot?</b></p> <p>12 A I don't know.</p> <p>13 <b>Q Does Mr. Guo pay it?</b></p> <p>14 A I don't know.</p> <p>15 <b>Q What about it's former spot, 800</b></p> <p>16 <b>Fifth Avenue, you know the answer to that</b></p> <p>17 <b>question?</b></p> <p>18 A No.</p> <p>19 <b>Q What was GSNY's first office after</b></p> <p>20 <b>it was formed?</b></p> <p>21 A The first one I knew of was 800</p> <p>22 Fifth Avenue.</p> <p>23 <b>Q Do you know what a family office</b></p> <p>24 <b>is; have you ever heard that term before?</b></p> <p>25 A Yes.</p> <p style="text-align: right;">Page 170</p>	<p>1 A. COLUCCIO</p> <p>2 A Somewhat. I guess not exactly.</p> <p>3 <b>Q Tell me what your understanding of</b></p> <p>4 <b>what a family office is.</b></p> <p>5 A I guess just a team of people who</p> <p>6 provide services to a family with whatever</p> <p>7 type of projects they need help with.</p> <p>8 <b>Q So is Golden Spring New York the</b></p> <p>9 <b>family office for other families besides</b></p> <p>10 <b>Guo?</b></p> <p>11 A Not that I know of, but it's other</p> <p>12 clients are associates of the Guo family or</p> <p>13 business partners of the Guo family.</p> <p>14 <b>Q Okay. Does that include, for</b></p> <p>15 <b>example, the Saraca Media Group?</b></p> <p>16 MS. TESKE: Object to the</p> <p>17 form.</p> <p>18 Direct the witness not to</p> <p>19 answer.</p> <p>20 <b>Q Do you know the answer to that</b></p> <p>21 <b>question?</b></p> <p>22 MS. TESKE: Object.</p> <p>23 And direct the witness not to</p> <p>24 answer.</p> <p>25 <b>Q I mean, look, one of the purposes</b></p> <p style="text-align: right;">Page 172</p>
<p>1 A. COLUCCIO</p> <p>2 <b>Q Is GSNY a family office for Guo?</b></p> <p>3 MS. TESKE: Object to the</p> <p>4 form.</p> <p>5 You can answer.</p> <p>6 A Yes, but not only for Mr. Guo.</p> <p>7 <b>Q So have you ever heard of such a</b></p> <p>8 <b>thing as a family office for more than one</b></p> <p>9 <b>family?</b></p> <p>10 MS. TESKE: Object to the</p> <p>11 form.</p> <p>12 A I don't know.</p> <p>13 <b>Q Okay. Is it your testimony that</b></p> <p>14 <b>Golden Spring New York is a family office</b></p> <p>15 <b>for families other than the Guo family?</b></p> <p>16 A Well, I just mean that the Guo</p> <p>17 family isn't our only client.</p> <p>18 <b>Q A family office handles the</b></p> <p>19 <b>investments for a family, right, it handles</b></p> <p>20 <b>the business affairs for a family?</b></p> <p>21 MS. TESKE: Object to the</p> <p>22 form.</p> <p>23 <b>Q Is that your understanding of what</b></p> <p>24 <b>a family office is?</b></p> <p>25 MS. TESKE: Same objection.</p> <p style="text-align: right;">Page 171</p>	<p>1 A. COLUCCIO</p> <p>2 of the research agreement was for Guo to use</p> <p>3 his own media to publicize the findings;</p> <p>4 isn't that right?</p> <p>5 MS. TESKE: Just object to the</p> <p>6 form of the question.</p> <p>7 A I believe so.</p> <p>8 <b>Q And is Saraca Media Group one of</b></p> <p>9 <b>the entities that was to do that work under</b></p> <p>10 <b>the research agreement?</b></p> <p>11 MS. TESKE: Object to the</p> <p>12 form.</p> <p>13 A I'm not sure.</p> <p>14 <b>Q Who knows the answer to that?</b></p> <p>15 A I don't know.</p> <p>16 <b>Q Someone at Golden Spring knows</b></p> <p>17 <b>that, don't they?</b></p> <p>18 MS. TESKE: Object to the</p> <p>19 form?</p> <p>20 A I don't know.</p> <p>21 <b>Q How about Guo Media, was that the</b></p> <p>22 <b>entity that was supposed to publicize the</b></p> <p>23 <b>research results under the research</b></p> <p>24 <b>agreement?</b></p> <p>25 A I'm not sure.</p> <p style="text-align: right;">Page 173</p>

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<p>1 A. COLUCCIO</p> <p>2 <b>Q Does Golden Spring New York</b></p> <p>3 <b>control Saraca Media Group?</b></p> <p>4 MS. TESKE: Beyond the scope.</p> <p>5 If you know, you can answer.</p> <p>6 A I think Golden Spring New York is</p> <p>7 a parent company of Saraca, but I'm not</p> <p>8 positive.</p> <p>9 <b>Q Who's the president of Saraca?</b></p> <p>10 MS. TESKE: Object to the</p> <p>11 form.</p> <p>12 She's here to testify as GSNY</p> <p>13 not Saraca.</p> <p>14 A I don't know.</p> <p>15 <b>Q Is Saraca's equipment set up in</b></p> <p>16 <b>the GSNY office?</b></p> <p>17 MS. TESKE: Object. She's</p> <p>18 here to testify as to GSNY.</p> <p>19 If you know, you can answer.</p> <p>20 A I don't think Saraca has any</p> <p>21 equipment.</p> <p>22 <b>Q Let's talk about some other work</b></p> <p>23 <b>that Golden Spring New York does as a family</b></p> <p>24 <b>office as you testified.</b></p> <p>25 <b>Does it register trademarks for</b></p> <p style="text-align: right;">Page 174</p>	<p>1 A. COLUCCIO</p> <p>2 mouth of other people.</p> <p>3 <b>Q Whereabout has Golden Spring New</b></p> <p>4 <b>York trademark, everything as just</b></p> <p>5 <b>beginning?</b></p> <p>6 MS. TESKE: Object.</p> <p>7 And you don't need to answer.</p> <p>8 <b>Q Okay. Does Golden Spring New York</b></p> <p>9 <b>provide advice for ACA?</b></p> <p>10 MS. TESKE: Object.</p> <p>11 And don't answer.</p> <p>12 <b>Q Is one of the individuals that</b></p> <p>13 <b>Golden Spring works with in providing a</b></p> <p>14 <b>family office for Guo a man named William?</b></p> <p>15 MS. TESKE: Object.</p> <p>16 And don't answer.</p> <p>17 <b>Q Have you ever met William before?</b></p> <p>18 MS. TESKE: Object.</p> <p>19 And don't answer.</p> <p>20 <b>Q What role did William play in</b></p> <p>21 <b>assisting Eastern Profit to enter into the</b></p> <p>22 <b>research agreement?</b></p> <p>23 MS. TESKE: Object.</p> <p>24 Don't answer.</p> <p>25 That's beyond the scope.</p> <p style="text-align: right;">Page 176</p>
<p>1 A. COLUCCIO</p> <p>2 the Guo family?</p> <p>3 A I don't know.</p> <p>4 <b>Q Did it file a trademark for Miles</b></p> <p>5 <b>Kwok?</b></p> <p>6 A I don't know.</p> <p>7 <b>Q Do you know who Miles Kwok is?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Who is that?</b></p> <p>10 A Mr. Guo Wengui.</p> <p>11 <b>Q Which one is his correct name, or</b></p> <p>12 <b>are they both correct?</b></p> <p>13 A They are both correct.</p> <p>14 <b>Q Are they both legal names for Guo</b></p> <p>15 <b>Wengui?</b></p> <p>16 MS. TESKE: Object to the</p> <p>17 form. She's not here to testify as</p> <p>18 to Guo Wengui's legal name. It's</p> <p>19 ridiculous. She's not answering</p> <p>20 that question.</p> <p>21 MR. GREIM: Okay. And the</p> <p>22 office doesn't know.</p> <p>23 MS. TESKE: No, I said she's</p> <p>24 not answering the question. But,</p> <p>25 yet again, you put words in the</p> <p style="text-align: right;">Page 175</p>	<p>1 A. COLUCCIO</p> <p>2 She's here to testify as to GSNY's</p> <p>3 role, not William's role.</p> <p>4 <b>Q Well, did GSNY work with William</b></p> <p>5 <b>to obtain financing for Eastern Profit to</b></p> <p>6 <b>enter into the agreement?</b></p> <p>7 A I don't know.</p> <p>8 <b>Q When I say William, you know who</b></p> <p>9 <b>I'm talking about?</b></p> <p>10 A I have met someone named William.</p> <p>11 I don't know if it's the person you're</p> <p>12 talking about.</p> <p>13 <b>Q Is he Chinese?</b></p> <p>14 A I believe so.</p> <p>15 <b>Q Do you know his last name?</b></p> <p>16 A No.</p> <p>17 <b>Q William Yu or William Gee?</b></p> <p>18 MS. TESKE: Again object.</p> <p>19 Goes way beyond the scope.</p> <p>20 If you know, you can answer.</p> <p>21 A I'm not sure.</p> <p>22 <b>Q How many times have you met him?</b></p> <p>23 MS. TESKE: Object.</p> <p>24 Don't answer?</p> <p>25 MR. GREIM: I mean look we</p> <p style="text-align: right;">Page 177</p>

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<p>1 A. COLUCCIO</p> <p>2 know that this person was engaged</p> <p>3 with Golden Spring to do this work.</p> <p>4 The witness wasn't prepared on it,</p> <p>5 but I'm going to at least try to jog</p> <p>6 her memory.</p> <p>7 MS. TESKE: You can ask her.</p> <p>8 This is beyond the scope. If you</p> <p>9 can tell me where in the Court's</p> <p>10 order this is within the scope, then</p> <p>11 we can have a conversation.</p> <p>12 MR. GREIM: Let's start with</p> <p>13 number three and number four.</p> <p>14 MS. TESKE: No. Within the</p> <p>15 Court's order, not your deposition</p> <p>16 notice because we've already</p> <p>17 established that's way beyond the</p> <p>18 Court's order.</p> <p>19 MR. GREIM: So you object to</p> <p>20 the deposition notice. I guess</p> <p>21 we're learning that today.</p> <p>22 MS. TESKE: Of course because</p> <p>23 it has been modified by the Court's</p> <p>24 order.</p> <p>25</p> <p style="text-align: right;">Page 178</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q Let's go back to this work by GSNY</b></p> <p>3 <b>as a family office, okay.</b></p> <p>4 <b>Has Golden Spring New York</b></p> <p>5 <b>imported or exported assets from Hong Kong</b></p> <p>6 <b>on behalf of the Guo family?</b></p> <p>7 MS. TESKE: It's beyond the</p> <p>8 cope.</p> <p>9 And I direct her not to</p> <p>10 answer.</p> <p>11 <b>Q Does Golden Spring New York share</b></p> <p>12 <b>any employees with Golden Spring Hong Kong?</b></p> <p>13 MS. TESKE: Beyond the scope.</p> <p>14 You can answer, if you know.</p> <p>15 A I don't think so.</p> <p>16 <b>Q How about Donald Chan?</b></p> <p>17 MS. TESKE: Object. Beyond</p> <p>18 the scope.</p> <p>19 You don't need to answer that.</p> <p>20 <b>Q Okay. Let's go back to the family</b></p> <p>21 <b>office. Does Golden Spring New York provide</b></p> <p>22 <b>any services for rule of law foundation?</b></p> <p>23 MS. TESKE: Object.</p> <p>24 You don't need to answer that.</p> <p>25 <b>Q Rule of law society?</b></p> <p style="text-align: right;">Page 180</p>
<p>1 A. COLUCCIO</p> <p>2 MR. GREIM: So Golden Spring's</p> <p>3 dealings with Eastern Profit and Guo</p> <p>4 Wengui between January 1, 2017, and</p> <p>5 July 1, 2019, based on the</p> <p>6 negotiation, execution or</p> <p>7 performance of the contract at</p> <p>8 issue, we're not going to get into</p> <p>9 the financing of the contract?</p> <p>10 MS. TESKE: She can testify as</p> <p>11 to conversations or communications</p> <p>12 with Mr. Guo or Eastern, but not</p> <p>13 with William.</p> <p>14 MR. GREIM: I see. So if</p> <p>15 Golden Spring dealt with ACA on</p> <p>16 financing Eastern Profit's contract,</p> <p>17 your position is it's out of bounds.</p> <p>18 MS. TESKE: The judge has</p> <p>19 already said things about ACA are</p> <p>20 out of bounds.</p> <p>21 MR. GREIM: No.</p> <p>22 MS. TESKE: And yes, the order</p> <p>23 is specifically with respect to</p> <p>24 Golden Spring limited to eastern and</p> <p>25 Mr. Guo.</p> <p style="text-align: right;">Page 179</p>	<p>1 A. COLUCCIO</p> <p>2 MS. TESKE: Same objection,</p> <p>3 Eddy.</p> <p>4 She's not going to get into</p> <p>5 specific clients.</p> <p>6 <b>Q Does Golden Spring New York pay</b></p> <p>7 <b>Lianchao Han?</b></p> <p>8 A I don't know.</p> <p>9 <b>Q Does Golden Spring New York</b></p> <p>10 <b>arrange payments for any entity related to</b></p> <p>11 <b>Lianchao Han?</b></p> <p>12 MS. TESKE: Objection. Beyond</p> <p>13 the scope.</p> <p>14 You can answer, if you know.</p> <p>15 A I don't know.</p> <p>16 <b>Q I'm going to show you what we're</b></p> <p>17 <b>marking as Golden Spring Four.</b></p> <p>18 <b>(Whereupon, Golden Spring's</b></p> <p>19 <b>corporate filings were marked as</b></p> <p>20 <b>Golden Spring Exhibit 4 for</b></p> <p>21 <b>identification as of this date.)</b></p> <p>22 <b>Q All right. Now, we have pulled</b></p> <p>23 <b>from the New York State Department of State</b></p> <p>24 <b>division of corporations state records the</b></p> <p>25 <b>corporate filings of the entity on which</b></p> <p style="text-align: right;">Page 181</p>

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<p>1 A. COLUCCIO</p> <p>2 you're here testifying today, golden Spring</p> <p>3 New York Limited. And so what I'm showing</p> <p>4 you here is what we were able to pull from</p> <p>5 New York State.</p> <p>6 Now, first of all, have you seen</p> <p>7 this the document before?</p> <p>8 A No. I don't believe so.</p> <p>9 <b>Q Who does the corporate filings for</b></p> <p>10 <b>Golden Spring New York?</b></p> <p>11 A I'm not sure.</p> <p>12 <b>Q All right. Let's go to the second</b></p> <p>13 <b>page of the very first document, which was</b></p> <p>14 <b>an application for authority for Golden</b></p> <p>15 <b>Spring to operate as a foreign corporation</b></p> <p>16 <b>in New York. And so you'll see it's signed</b></p> <p>17 <b>at the bottom.</b></p> <p>18 <b>What name do you see down there?</b></p> <p>19 A Qiang, Guo.</p> <p>20 <b>Q And what's in parentheses after</b></p> <p>21 <b>his name?</b></p> <p>22 A Mile's son.</p> <p>23 <b>Q And his title?</b></p> <p>24 A Executive vice president.</p> <p>25 <b>Q Now, is Mile's son the English</b></p> <p style="text-align: right;">Page 182</p>	<p>1 A. COLUCCIO</p> <p>2 something. So the last document was filed March 10,</p> <p>3 2015. Now we're in March of 2017.</p> <p>4 Who is listed as the CEO of Golden</p> <p>5 Spring?</p> <p>6 A Yanping Wang.</p> <p>7 <b>Q That's the same thing as Yvette,</b></p> <p>8 <b>correct?</b></p> <p>9 A Right.</p> <p>10 <b>Q Then you see an address of 800</b></p> <p>11 <b>Fifth Avenue, Suite 21F?</b></p> <p>12 A Right.</p> <p>13 <b>Q Is that the same address you</b></p> <p>14 <b>testified earlier as the office where you</b></p> <p>15 <b>started to work at Golden Spring?</b></p> <p>16 A Right.</p> <p>17 <b>Q And let's see what else here. At</b></p> <p>18 <b>the bottom you see there's an electronic</b></p> <p>19 <b>signature by a lawyer Courtney Scanlon?</b></p> <p>20 MS. TESKE: Object to the</p> <p>21 form.</p> <p>22 <b>Q Do you see that?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Do you know who that is?</b></p> <p>25 A No.</p> <p style="text-align: right;">Page 184</p>
<p>1 A. COLUCCIO</p> <p>2 nickname for Guo Qiang?</p> <p>3 MS. TESKE: Objection. Beyond</p> <p>4 the scope.</p> <p>5 A I think that's his name in</p> <p>6 English. That's what he goes by.</p> <p>7 <b>Q Right. That's not a translation,</b></p> <p>8 <b>but that's what he goes by in English?</b></p> <p>9 A I think so.</p> <p>10 <b>Q And this is the son of Guo Wengui,</b></p> <p>11 <b>correct?</b></p> <p>12 A I believe so.</p> <p>13 MS. TESKE: Objection to form.</p> <p>14 <b>Q Who is the current executive vice</b></p> <p>15 <b>president of Golden Spring New York; do you</b></p> <p>16 <b>know?</b></p> <p>17 A I don't know.</p> <p>18 <b>Q Do you know if Qiang Guo ever</b></p> <p>19 <b>stopped being executive vice president of</b></p> <p>20 <b>New York or of Golden Spring New York?</b></p> <p>21 A I don't know.</p> <p>22 <b>Q Let's flip forward to the middle</b></p> <p>23 <b>here.</b></p> <p>24 <b>So you'll see the first biennial</b></p> <p>25 <b>statement; and every two years you have to file</b></p> <p style="text-align: right;">Page 183</p>	<p>1 A. COLUCCIO</p> <p>2 <b>Q You ever met her?</b></p> <p>3 A No.</p> <p>4 <b>Q Let's go to the last one, second</b></p> <p>5 <b>to, the very last page is now the 2019</b></p> <p>6 <b>statement. And do you see once again Yvette</b></p> <p>7 <b>as listed, Yvette Wang as listed as CEO?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Using her name Yangping?</b></p> <p>10 A Um-hmm.</p> <p>11 <b>Q What other businesses shared 800</b></p> <p>12 <b>Fifth Avenue, Suite 21F with Golden Spring</b></p> <p>13 <b>New York?</b></p> <p>14 MS. TESKE: Objection to form.</p> <p>15 Beyond the scope.</p> <p>16 A None that I know of.</p> <p>17 <b>Q Have you met Mile's son by the</b></p> <p>18 <b>way?</b></p> <p>19 MS. TESKE: Asked and</p> <p>20 answered.</p> <p>21 <b>Q I'm sorry. Maybe you did, but I</b></p> <p>22 <b>forget now.</b></p> <p>23 A I've met him.</p> <p>24 <b>Q And has he ever given you</b></p> <p>25 <b>direction on your work for Golden Spring?</b></p> <p style="text-align: right;">Page 185</p>

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<p>1 A. COLUCCIO</p> <p>2 A No.</p> <p>3 <b>Q Who typically does give direction</b></p> <p>4 <b>to Golden Spring on behalf of the Guo</b></p> <p>5 <b>family?</b></p> <p>6 MS. TESKE: Object to the</p> <p>7 form. It's beyond the scope as it</p> <p>8 pertains to other clients. It's</p> <p>9 outside of the balance of the</p> <p>10 Court's order, so if you're talk</p> <p>11 about with respect to this case,</p> <p>12 then she can answer.</p> <p>13 MR. GREIM: Okay. Let's keep</p> <p>14 it with respect to this case.</p> <p>15 <b>Q Who on behalf of the Guo Family</b></p> <p>16 <b>gives direction to Golden Spring New York?</b></p> <p>17 MS. TESKE: Object to the</p> <p>18 form?</p> <p>19 A I believe Mr. Guo.</p> <p>20 MR. GREIM: Well, we're going</p> <p>21 to hold this deposition open. We</p> <p>22 have some disputes about the topics</p> <p>23 in the scope. I think we've had a</p> <p>24 lot of talk on the record about it,</p> <p>25 but we're not going to use up the</p> <p style="text-align: right;">Page 186</p>	<p>1 A. COLUCCIO</p> <p>2 ordering a copy of the transcript?</p> <p>3 MS. TESKE: No one will be</p> <p>4 provided to us as a nonparty.</p> <p>5 MR. GREIM: I will order a</p> <p>6 copy.</p> <p>7 VIDEOGRAPHER: The time is</p> <p>8 1:09 p.m. Tuesday, November 12,</p> <p>9 2019. This is the end of media</p> <p>10 number Three and complete today 's</p> <p>11 videotape deposition of Ms. Amelia</p> <p>12 Coluccio.</p> <p>13 (Continued on the next page to accommodate the</p> <p>14 jurat).</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 188</p>
<p>1 A. COLUCCIO</p> <p>2 fingers and forearms of the court</p> <p>3 reporter or the tape any longer on</p> <p>4 that. So we're just going to hold</p> <p>5 it open and then we'll have our</p> <p>6 discussion after we're done, but I</p> <p>7 want to thank you for your time</p> <p>8 today.</p> <p>9 x: Object to the holding of</p> <p>10 the deposition open. We made the</p> <p>11 witness available all day today. If</p> <p>12 we're ending now then that is the</p> <p>13 end of the deposition. That's our</p> <p>14 position.</p> <p>15 MR. GREIM: And just to be</p> <p>16 clear, the basis of our objection or</p> <p>17 of our holding this deposition open</p> <p>18 is the witnesses lack of preparation</p> <p>19 and lack of knowledge about pretty</p> <p>20 much everything about the case. And</p> <p>21 so we will explore that in more</p> <p>22 detail off the record, but thank you</p> <p>23 very much for being with us today.</p> <p>24 It was nice to meet you.</p> <p>25 COURT REPORTER: Are you</p> <p style="text-align: right;">Page 187</p>	<p>1 A. COLUCCIO</p> <p>2 We are off the record.</p> <p>3 MR. GREIM: I will order from</p> <p>4 you and then I'll give it to her as</p> <p>5 we've been doing.</p> <p>6 (Whereupon, this examination was</p> <p>7 concluded at 1:10 p.m.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11 _____</p> <p>12 AMELIA COLUCCIO</p> <p>13</p> <p>14</p> <p>15 Subscribed and sworn to</p> <p>16 before me on this ____ day</p> <p>17 of _____, _____.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>_____  Notary Public</p> <p style="text-align: right;">Page 189</p>

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1				1	
2				2	
3				3	C E R T I F I C A T E
4	EXAMINATION BY		PAGE	4	
5	Mr. Greim	7		5	STATE OF NEW YORK)
6				6	:SS
7				7	COUNTY OF NASSAU)
8				8	
9				9	I, KIARA M. MILLER, a Notary Public within
10				10	and for the State of New York, do hereby certify:
11				11	That, Amelia Coluccio, the witness whose
12				12	deposition is herein before set forth, was duly
13				13	sworn by me and that such deposition is a true
14				14	record of the testimony given by such witness.
15				15	I further certify that I am not related to
16				16	any of the parties to this action by blood or
17				17	marriage and that I am in no way interested in the
18				18	outcome of this matter.
19				19	
20				20	
21				21	Signature requested.
22				22	
23				23	KIARA M. MILLER
24				24	
25				25	
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**30(b)(6): Amelia Coluccio**  
**November 12, 2019**



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**30(b)(6): Amelia Coluccio**  
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**30(b)(6): Amelia Coluccio**  
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